

DISTRICT COURT, BOULDER COUNTY, COLORADO

Boulder County District Court
1777 Sixth Street
PO Box 4249
Boulder, CO 80306-4249

Plaintiff:

MARGARET HAUBOLD, Individually and as Personal
Representatives of the **Estate of NIELS B. HAUBOLD**

v.

Defendants:

1. **UNITED STATES GYPSUM COMPANY**, a Texas corporation;
2. **ABEX CORPORATION** (formerly American Brake Shoe & Foundry and American Brake Shoe Company), a Delaware corporation;
3. **ARMSTRONG WORLD INDUSTRIES, INC.**, a Texas corporation;
4. **GAF CORPORATION**, a Delaware corporation;
5. **MCMaster-CARR SUPPLY COMPANY**, an Illinois corporation;
6. **RIO GRANDE COMPANY**, a Colorado corporation;
7. **PLATEAU SUPPLY COMPANY**, a Colorado corporation;
8. **T&N, INC.** (formerly TURNER & NEWALL, LTD.), a United Kingdom corporation;
9. **W.R. GRACE COMPANY-CONN**, a Connecticut corporation;
10. **OWENS ILLINOIS, INC.**, an Ohio corporation.

Attorney: John D. Hayes, # 21060
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Case No.: 00 CV 1857

Div./Ctrm.: 3

**DEFENDANT, MCMASTER-CARR SUPPLY COMPANY'S
PRIVILEGE LOG**

Defendant, **MCMASTER-CARR SUPPLY COMPANY** ("McMaster-Carr"), by its attorneys, **SETER GOLDFARB & RICE, L.L.C.**, hereby claims privilege or protection to the following documents:

No.	Date	Description	Reason for Withholding
1	various dates	Correspondence between Defendant McMaster-Carr, its attorneys, and/or its insurer in anticipation of and preparation for litigation of this matter	attorney/client privilege, work product protection
2	various dates	Attorney notes	attorney/client privilege, work product protection

Respectfully submitted,

SETER GOLDFARB & RICE, L.L.C.

By /s/ Spencer L.

Sears

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*Attorneys for McMaster-Carr
Supply Company*

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 12th day of June, 2003, a true and correct copy of the above and foregoing **DEFENDANT, MCMASTER-CARR SUPPLY COMPANY'S PRIVILEGE LOG** was placed in the U.S. Mail, First Class, postage pre-paid, address to:

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/s/ Barbara A. Ortell

SETER GOLDFARB & RICE, L.L.C.

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May 14, 2003

MAY 15 2003

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RE: *Haubold v. McMaster-Carr*
Civil Action No. 00 CV 1857
Boulder County District Court

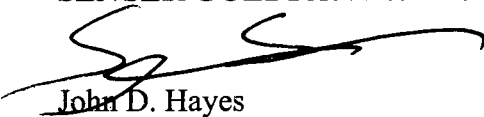
Dear Ms. Snyder:

This letter is in response to your letter dated May 7, 2003, in which you requested that we supplement our discovery responses and provide Plaintiff with a privilege log. As discussed with Nancy Adler of your office, McMaster-Carr will respond to your request on or before June 6, 2003.

Thank you for your attention to this matter, and please do not hesitate to contact us with any questions.

Very truly yours,

SETER GOLDFARB & RICE, L.L.C.


John D. Hayes
Spencer L. Sears

JDH:SLS:jak

SGR