

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup> JUDICIAL CIRCUIT OF FLORIDA,  
IN AND FOR BROWARD COUNTY

CASE NO.: 12-034123 (07)

P&S ASSOCIATES, GENERAL  
PARTNERSHIP, etc., et al.,

Plaintiffs,

v.

MICHAEL D. SULLIVAN, et al.,

Defendants.

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**DEFENDANT FRANK AVELLINO'S NOTICE OF FILING  
PRIVILEGE LOG FOR DOCUMENTS RELATING TO PLAINTIFFS'  
SUBPOENA FOR VIDEO CONFERENCE DEPOSITION *DUCES TECUM*  
OF NON-PARTY RACHEL LEIRSCH DATED MAY 26, 2016**

Defendant, Frank Avellino, by and through his undersigned counsel, hereby files his Privilege Log relating to documents produced in response to Plaintiffs' Subpoena for Video Conference Deposition *Duces Tecum* of Non-Party Rachel Leirsch, dated May 26, 2016. A copy of the Privilege Log is attached hereto as **Exhibit A**.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10th day of June, 2016, the foregoing document is being served on those on the attached service list by electronic service via the Florida Court E-

Filing Portal in compliance with Fla. Admin Order No. 13-49.

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**DEFENDANT FRANK AVELLINO'S PRIVILEGE LOG FOR DOCUMENTS  
RELATING TO PLAINTIFFS' SUBPOENA FOR VIDEO CONFERENCE DEPOSITION  
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"AC" = Attorney-Client Communication

<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>CC</b>	<b>TYPE OF DOCUMENT</b>	<b>SUBJECT</b>	<b>PRIVILEGE</b>
06/03/16	Rachel Liersch	Gary Woodfield, Esq.		Email	Deposition Preparation	Attorney-Client
05/31/16	Rachel Liersch	Gary Woodfield, Esq.		Email	Deposition Preparation	Attorney-Client
05/31/16	Gary Woodfield, Esq.	Rachel Liersch		Email	Deposition Preparation	Attorney-Client