

IN THE CIRCUIT COURT OF THE 17TH 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.

DEFENDANT FRANK AVELLINO'S
NOTICE OF FILING PRIVILEGE LOG

Defendant, Frank Avellino, by and through his undersigned counsel, hereby files his Privilege Log relating to documents produced in response to Plaintiffs' Fifth Request for Production of Documents dated October 5, 2015. A copy of the Privilege Log is attached hereto as **Exhibit A**.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of November, 2015, 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 RELATING TO DOCUMENTS
PRODUCED IN RESPONSE TO PLAINTIFFS' FIFTH REQUEST FOR
PRODUCTION OF DOCUMENTS, DATED OCTOBER 5, 2015**

"AC" = Attorney-Client Communication
"JD" = Joint Defense

BATES NUMBER	DATE	TO	FROM	CC	TYPE OF DOCUMENT	SUBJECT	PRIVILEGE
AVELLINO_P&S000760 Through AVELLINO_P&S000762	12/02/11	Nancy Avellino	Helen Davis Chaitman, Esq.	Lourdes Blanco	Email String	SEC Claims	AC/JD
	12/02/11	Helen Davis Chaitman, Esq.	Nancy Avellino			SEC Claims	AC/JD
	11/29/11	Nancy Avellino	Helen Davis Chaitman, Esq.			SEC Claims	AC/JD
	11/29/11	Helen Davis Chaitman, Esq.	Nancy Avellino			SEC Claim	AC/JD
AVELLINO_P&S000763 Through AVELLINO_P&S000771	11/03/11	Michael Sullivan	Helen Davis Chaitman, Esq.		Email String	P&P/S&P Settlements	AC/JD
	10/28/11	Helen Davis Chaitman, Esq.	Thomas Wearsch, Esq.			P&P/S&P Settlements	AC/JD
	11/08/11	Frank & Nancy Avellino	Michael Sullivan			2 nd Circuit and Litigation of Customer Status for Retirement Account Investors	AC/JD
	11/08/11	Michael Sullivan	Helen Davis Chaitman, Esq.			2 nd Circuit and Litigation of Customer Status for Retirement Account Investors	AC/JD
	11/08/11	Helen Davis Chaitman, Esq.	Michael Sullivan			2 nd Circuit and Litigation of Customer Status for Retirement Account Investors	AC/JD
	11/08/11	Michael Sullivan	Helen Davis Chaitman, Esq.			2 nd Circuit and Litigation of Customer Status for Retirement Account Investors	AC/JD
	06/21/11	Tom Avellino	Michael Sullivan			Peshkin v. Levy-Church, et al. Appellant's Brief	AC/JD
	06/21/11	Helen Davis Chaitman, Esq.	Helen Davis Chaitman, Esq.			Peshkin v. Levy-Church, et al. Appellant's Brief	AC/JD

BATES NUMBER	DATE	TO	FROM	CC	TYPE OF DOCUMENT	SUBJECT	PRIVILEGE
	04/05/11	Frank & Nancy Avellino	Michael Sullivan			S&P/P&S Claims	AC/JD
	04/05/11	Michael Sullivan, Chat Pugatch, Beth Pugatch	Helen Davis Chaitman, Esq.	Helen Davis Chaitman, Esq.		S&P/P&S Claims	AC/JD
	04/04/11	Frank & Nancy Avellino	Michael Sullivan			Peshkin v. Levy-Church, et al.	AC/JD
AVELLINO_P&S000754	09/01/15	Frank and Nancy Avellino	Michael Sullivan		Email String	Legal Invoices	AC/JD
	08/25/15	Mark Raymond, Jonathan Etra, Shane Martin	Diane & Michael Bienes			Legal Invoices	AC/JD
AVELLINO_P&S000755	09/04/15	Frank & Nancy Avellino	Michael Bienes		Email	Deposition Preparation	AC/JD