



**UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION**

**In the Matter of**  
**LABORATORY CORPORATION  
OF AMERICA**  
**and**  
**LABORATORY CORPORATION  
OF AMERICA HOLDINGS,  
corporations.**

**Docket No. 9345**  
**PUBLIC**

**RESPONDENTS' MOTION TO COMPEL DOCUMENT PRODUCTION**

Respondents Laboratory Corporation of America and Laboratory Corporation of America Holdings (collectively, "LabCorp"), pursuant to 16 C.F.R. §§ 3.37(b), 3.38A, and 3.38(a), respectfully move to compel Complaint Counsel to produce all documents responsive to Respondents' First Request for Production of Documents. Complaint Counsel has withheld documents based on the government deliberative process privilege, the attorney work-product doctrine, and the government informant privilege. Complaint Counsel has improperly invoked these privileges and must produce the withheld documents. Moreover, Complaint Counsel has not produced responsive communications with the Commission and has not included them on its privilege logs. It should be required to one or the other.

**BACKGROUND**

On December 17, 2010, Respondents served their First Request for Documents on the Federal Trade Commission, attached as Exhibit A (the "Document Requests"). On January 18, 2011, Complaint Counsel served Objections and Responses to the Document Requests

("Objections and Responses"), attached as Exhibit B. Complaint Counsel also served Plaintiff's First Privilege Log, attached as Exhibit C.<sup>1</sup>

In its First Privilege Log, Complaint Counsel asserted the government deliberative process privilege and the attorney work-product doctrine for every document. Complaint Counsel also asserted the government informant privilege with respect to certain documents. While the First Privilege Log included a "Description" column that purported to describe the nature of the documents, the description was nearly identical for every document. Indeed, the only differences in the descriptions were the names of the senders and recipients and whether the document was an e-mail or an attachment – every description described the document as "regarding investigation of LabCorp's purchase of Westcliff."

Because the First Privilege Log failed to provide an adequate basis on which Respondents could assess the privilege claims and because it did not include internal FTC communications, Respondents conferred with Complaint Counsel via telephone on January 14, 2011. On that call, Complaint Counsel explained that all entries on the log pertain to communications with third parties. Complaint Counsel also confirmed that it had not produced or logged communications within the FTC, including communications between the FTC Staff and Commissioners. Respondents, in turn, questioned Complaint Counsel's various privilege claims and requested a revised privilege log adequate to assess the basis of the privileges asserted. Respondents also requested that Complaint Counsel either produce communications between FTC staff and the Commission/Commissioners or produce a log of those

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<sup>1</sup> On December 17, 2010, Respondents also served the FTC with Defendants' First Request for Documents in the related preliminary injunction action pending in the United States District Court for the Central District of California, Case No. SACV10-1873 (AG) (MLGx) (the "Preliminary Injunction Action"). The parties have agreed that discovery obtained in the Preliminary Injunction Action could be used in the instant proceeding, and vice versa. Accordingly, Respondents understand that Complaint Counsel's privilege logs apply to both the First Request for Production in the Preliminary Injunction Action as well as the Part III First Request, which covered substantially the same documents.

communications if Complaint Counsel believed that they were privileged. Complaint Counsel and Respondent could not reach agreement, but Complaint Counsel indicated that it would consider amending its First Privilege Log.

On January 18, 2011, Complaint Counsel served an Amended First Privilege Log, attached hereto as Exhibit D. The Amended Privilege Log still did not provide enough information upon which Respondents could assess the privilege claims. Complaint Counsel also served Respondents with Plaintiff's Supplemental Privilege Log, attached hereto as Exhibit E. The Supplemental Privilege Log lists sets of communications between the FTC and third-parties (including an individual represented by Respondents' Counsel). On or about January 25, 2011, Respondents discussed their continued concerns regarding the privilege logs and also noted that Complaint Counsel failed to provide an affidavit. Complaint Counsel indicated that it would assess whether it had such an obligation and respond accordingly. Respondents again followed up on February 7 and 8, 2011 and were informed that an affidavit was pending. As of this filing, Respondents have not received that affidavit, and the parties have reached an impasse.

## ARGUMENT

### **I. Complaint Counsel Should be Compelled to Produce Documents Withheld on the Basis of the Government Deliberative Process Privilege**

#### **A. Complaint Counsel waived the privilege by failing to properly invoke it**

Complaint Counsel failed to properly assert the government deliberative process privilege by not providing Respondents with an affidavit from an FTC Commissioner or another high-ranking agency official with delegated authority to invoke the privilege. This failure alone waives the privilege. *See L.H. v. Schwarzenegger*, 2008 WL 2073958, \*7-8 (E.D. Cal. May 14, 2008) (holding that the agency waived the privilege and noting that “an explanation why [the document] properly falls within the scope of the privilege” is of “critical importance”).

The agency head or high-ranking official with delegated authority must personally review the documents for which the privilege is asserted. *Landry v. Fed. Deposit Ins. Corp.*, 204 F.3d 1125, 1135 (D.C. Cir. 2000); *In re Union Oil Co. of California*, 2003 FTC WL 21642422 (June 30, 2003) (citing *Landry* and holding that the privilege does not apply where it was not properly asserted). The procedural requirements are designed to “ensure that the privileges are presented in a deliberate, considered, and reasonably specific manner.” *Landry*, 204 F.3d at 1135 (citations omitted). Courts “have not permitted staff attorneys, especially those who are participating in the pending litigation, to assert the privilege on behalf of the agency.” *United States v. Rozet*, 183 F.R.D. 662, 665 (N.D. Cal. 1998).

**B. The privilege does not apply to the documents at issue**

Not only has Complaint Counsel waived the privilege by failing to properly invoke it, but, judging by the information Respondents can glean from the privilege log, Complaint Counsel’s assertions of the privilege appear unjustified.<sup>2</sup>

The deliberative process privilege only applies to documents that are both deliberative and pre-decisional. *See, e.g., Hongsermeier v. C.I.R.*, 621 F.3d 890, 904 (9th Cir. 2010). The burden is on the government to establish “what deliberative process is involved, and the role played by the documents in issue in the course of that process.” *Coastal States Gas Corp. v. Dep’t of Energy*, 617 F.2d 854, 868 (D.C. Cir. 1980). Complaint Counsel has failed to establish that the withheld documents are pre-decisional and has not even indicated to which Agency decision(s) the documents supposedly pertain. *Maricopa Audubon Soc’y v. U.S. Forest Serv.*, 108 F.3d 1089, 1094 (9th Cir. 1997).

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<sup>2</sup> Commission Rule 3.38A requires Complaint Counsel to provide a privilege log that “will enable other parties to assess the claim.” Complaint Counsel’s privilege logs fall far short of this standard in many respects, but Respondents have attempted to assess Complaint Counsel’s claims given the information available and the discussions between counsel for Respondents and Complaint Counsel regarding the logs.

The Amended Privilege Log indicates that nearly all – if not all<sup>3</sup> – of the supposedly privileged communications are between the FTC and the California Department of Justice.<sup>4</sup> This is improper. A non-federal governmental agency is only within the privilege if it is advising the federal agency as though it is an unbiased consultant. *See People for the Am. Way Found. v. U.S. Dep't of Educ.*, 516 F. Supp. 2d 28, 37 (D.D.C. 2007) (holding that a non-federal agency can be considered under the “consultant corollary” of the privilege, but it must be in an advisory position and not share responsibility and authority with the federal agency). A consultant cannot “represent an interest of its own, or the interest of any other client, when it advises the agency that hires it.” *Dep't of the Interior v. Klamath Water Users Protective Ass'n*, 532 U.S. 1, 11 (2001).

The California Department of Justice is far from an unbiased consultant. The Office of the California Attorney General – part of the California Department of Justice – has brought a *qui tam* lawsuit against Respondents alleging that capitated rates for laboratory testing services are *too low*. By contrast, the FTC’s premise in the instant case is that Respondents’ merger with Westcliff will lead to *higher* capitated rates. The FTC apparently seeks the opposite of the result that the California Attorney General’s lawsuit attempts to achieve. Moreover, the California Attorney General investigated the LabCorp/Westcliff transaction and apparently declined to pursue an enforcement action, notwithstanding the FTC’s decision to challenge the merger. Therefore, the privilege cannot apply to communications between the FTC and the California Attorney General – a non-federal agency whose interests are at odds with the FTC. This defeats the alleged privilege for all documents involving the California Attorney General.

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<sup>3</sup> The Amended Privilege Log includes entries for voice messages that lack sufficient information for Respondents to decipher who are the parties to those communications. *See, e.g.*, Ex. C at 1, 25.

<sup>4</sup> For example, the sixth entry of the Amended Privilege Log is from Winston Chen (Winston.Chen@doj.ca.gov) to Matthew Teich (mteich@ftc.gov). Ex. C at 1.

With respect to the Supplemental Privilege Log, the FTC claims that communications between its staff and non-governmental third parties – Emmett Kane and Danny Shoemaker – are also privileged. Mr. Shoemaker is the Interim Manager of Westcliff and, in that capacity, is represented by Hogan Lovells US LLP. Mr. Kane is the *independent* Monitor pursuant to the Hold Separate Agreement and is represented by his own attorney. Regardless of who represents these individuals, they are independent of the FTC and the government deliberative process privilege clearly does not apply.

Moreover, the government deliberative process privilege is a qualified one and does not apply if the “need for the materials and the need for accurate fact-finding override the government’s interest in non-disclosure.” *FTC v. Warner Commc’ns, Inc.*, 742 F.2d 1156, 1161 (9th Cir. 1984). The factors to balance these interests are: 1) the relevance of the evidence; 2) the availability of other evidence; 3) the government’s role in the litigation; and 4) the extent to which disclosure would hinder frank and independent discussion regarding contemplated policies and decisions. *Id.* The documents at issue here are highly relevant because the California Attorney General’s Office conducted its own investigation into this transaction and apparently chose not to pursue litigation. Moreover, the California Attorney General’s office is actively pursuing a case against Respondents and other providers of clinical laboratory services with a goal that appears to be at odds with the FTC’s current case. To that end, communications between the FTC and the California Attorney General’s Office are relevant and unique to the FTC’s files. The FTC would clearly be required to produce these documents if it was a private party, and allowing the FTC to evade discovery of them simply because it is a federal agency would be “fundamentally unfair.” *F.D.I.C. v. Hatziyannis*, 180 F.R.D. 292, 293 (D. Md. 1998).

Finally, the FTC has made no claim that disclosing these communications would hinder frank discussions in any way – nor would such a claim be valid.

Complaint Counsel has failed to meet its burden in asserting the government deliberative process privilege to all withheld documents, and those documents should therefore be produced.

## **II. The Attorney Work-Product Doctrine Does Not Apply**

The attorney work-product doctrine does not save Complaint Counsel's privilege claims. The work-product doctrine does not apply to e-mails from an attorney to a third-party witness where the third party does not share a common interest with the party of the disclosing attorney. *Ricoh Co. Ltd. v. Aeroflex Inc.*, 219 F.R.D. 66, 70 (S.D.N.Y. 2003) (finding waiver of work-product protection over e-mails defense counsel sent to an "independent" third-party "in furtherance of an investigation of an affirmative defense"). Regarding communications with the Office of the California Attorney General, the FTC does not share a common interest with that Office, which has a case whose fundamental goals are at odds with that of the FTC. Regarding communications with Mr. Kane and Mr. Shoemaker, the FTC waived any protection it might have had in certain information by disclosing that information to Messrs. Shoemaker and Kane, who are independent and do not share a common interest with the FTC. The withheld documents are therefore not protected by the work-product doctrine.

Even if the work-product doctrine did somehow apply to the documents at issue, that protection can be overcome by a showing that there is a substantial need for the materials in the preparation of the case and that the material cannot be obtained without undue hardship. 16 C.F.R. § 3.31(c)(5). Here, the communications between the FTC and the Office of the California Attorney General could contain exculpatory evidence that is particularly relevant to this case. The California Attorney General considered whether to bring a lawsuit of its own against

Respondents to challenge the acquisition of Westcliff, but it chose *not* to do so. Thus, the Office of the Attorney General has information that is highly relevant to Respondents' case and that it shared with the FTC. The FTC should not be able to claim such documents are protected work-product in light of Respondents' substantial need for the information.

### **III. The Government Informant Privilege Does Not Apply Once the Informer Has Been Disclosed**

Complaint Counsel's assertion of the government informant privilege is also wholly without merit. The government has a limited privilege to withhold an informant's identity. Once the identity of the informer has been disclosed, the privilege no longer applies. *Roviaro v. United States*, 353 U.S. 53, 60 (1957); *see also In re MSC.Software Corp.*, 2002 FTC WL 31433972 (May 7, 2002) (Chappell, J.).

In the January 14, 2011 telephone conference with Respondents, Complaint Counsel represented that the withheld documents included the identity of informants whose names have already been disclosed to Respondents. Because the names of the government's "informants" have all been disclosed, there is no basis whatsoever for the government informant privilege.

### **IV. Complaint Counsel Must Produce or Log Communications with the Commission**

Complaint Counsel, as a party to the litigation, is required by Commission Rule 3.38A to submit a detailed log of the items withheld from Complaint Counsel's files. *In re MSC.Software Corp.*, 2002 FTC WL 31433929 (Feb. 21, 2002) (Chappel, J.). Respondents' Document Requests seek documents within Complaint Counsel's files, including communications with the Commission, yet Complaint Counsel has withheld those documents and has not included them on its privilege logs. Under Rule 3.31, "[C]omplaint counsel is [not] required to search for materials generated and transmitted between . . . complaint counsel and non-testifying Commission employees . . . ." Communications between FTC Staff and the



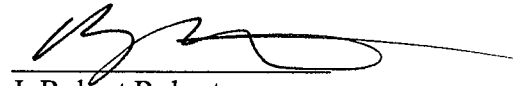
Commission/Commissioners are not, however, exempted. *See In re Inova Health System Found.*, 2008 FTC WL 2307161 (May 29, 2008) (statement of Commissioner Rosch) (concluding that the Administrative Procedures Act differentiates between Commission “employees” and Commissioners); *see also Tax Analysts v. I.R.S.*, 117 F.3d 607, 618 (D.C. Cir. 1997) (“In the governmental context, the ‘client’ may be the agency and the attorney may be an agency lawyer.”). As such, Respondents request that the Court compel Complaint Counsel to produce all such responsive documents in its files or, in the alternative, provide a privilege log including each such document.

### CONCLUSION

For the reasons set forth herein, Respondents respectfully request that the Court grant Respondents’ Motion to Compel.

Dated: February 11, 2011

Respectfully Submitted,



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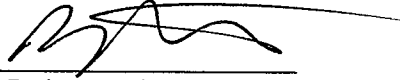
**CERTIFICATE OF CONFERENCE**

Respondents conferred with Complaint Counsel in an effort in good faith to resolve by agreement the issues raised by Respondents' Motion to Compel Document Production. On January 14, 2011, counsel for Respondents held a telephone conference with Complaint Counsel in which the parties discussed the issues at length. Respondents and Complaint Counsel were unable to reach agreement on the veracity of the privilege claims and on whether the FTC must produce – or include in its privilege log – documents within the FTC, including communications with the Commission. Although Complaint Counsel agreed to provide an amended privilege log, that log was still insufficient.

On or about January 25, 2011, Respondents discussed their continued concerns regarding the privilege logs with Complaint Counsel and also noted that Complaint Counsel had failed to provide an affidavit. Respondents held two more telephone conferences with Complaint Counsel – on February 7 and February 8, 2011 – to further resolve the disputed issues. Despite those repeated attempts, Respondents' and Complaint Counsel were unable to resolve the issues raised by this motion.

Dated: February 11, 2011

Respectfully Submitted,



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**[PROPOSED] ORDER**

Upon consideration of Respondents' Motion to Compel Document Production, any opposition thereto, and the Court being fully informed,

IT IS HEREBY ORDERED, that Complaint Counsel's Motion is GRANTED.

IT IS FURTHER ORDERED, that Complaint Counsel shall produce all documents listed in Plaintiff's Amended First Privilege Log in Response to Defendants' First Request for Documents to Plaintiff and Respondents' First Request for Documents to Federal Trade Commission, within \_\_\_\_ days of this Order.

IT IS FURTHER ORDERED, that Complaint Counsel shall produce all documents listed in Plaintiff's Supplemental Privilege Log in Response to Defendants' First Request for Documents to Plaintiff and Respondents' First Request for Documents to Federal Trade Commission, within \_\_\_\_ days of this Order.

IT IS FURTHER ORDERED, that Complaint Counsel shall produce all documents in Complaint Counsel's files responsive to Respondents' First Request for Documents to Federal

Trade Commission, or in the alternative produce a privilege log pursuant to Commission Rule 3.38A, within \_\_\_\_ days of this Order.

\_\_\_\_\_  
D. Michael Chappell  
Chief Administrative Law Judge

Date: \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that I caused to be filed via hand delivery an original with signature and one paper copy and via FTC e-file a .PDF copy that is a true and correct copy of the paper original of the foregoing document with:

Donald S. Clark  
Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, Rm. H-159  
Washington, DC 20580  
secretary@ftc.gov

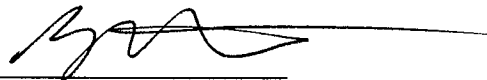
I also certify I delivered via electronic mail and hand delivery a copy of the foregoing to:

D. Michael Chappell  
Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW, Rm. H-113  
Washington, DC 20580  
oalj@ftc.gov

I also certify I delivered via electronic mail a copy of the foregoing to:

J. Thomas Greene  
Michael R. Moiseyev  
Jonathan Klarfeld  
Stephanie A. Wilkinson  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Date: February 11, 2011



Benjamin F. Holt  
Hogan Lovells US LLP  
*Counsel for Respondents Laboratory  
Corporation of America and Laboratory  
Corporation of America Holdings*

# Exhibit A





dealing with, evidencing, identifying, involving, reporting on, relating to, reflecting, referring to, regarding, studying, mentioning, or pertaining to, in whole or in part.

4. "Document" is used in the broadest sense and includes, but is not limited to, all writings, drawings, graphs, charts, spreadsheets, sound and video recordings, electronic data, or data compilations, and any other materials described in FTC Rule of Practice §§ 3.34(b) and 3.31(c)(1), whether printed, recorded, produced, stored, or reproduced by any mechanical or electronic process, or written or produced by hand. This also includes, but is not limited to, any information contained in any computer, database, or word processing system, whether or not yet printed out, within the possession, custody, or control of the FTC. A draft or non-identical copy (including one with notations) is a separate document within the meaning of this term.

5. The "FTC," "You," and "Your," as used herein, means the United States Federal Trade Commission and its bureaus, offices, predecessors, successors, and assignees, its present and former Commissioners, officers, employees, agents, servants, representatives, consultants, accountants, economists, and lawyers, and all other persons who are acting or have acted on behalf of, or who are or have been subject to the direction or control of, any of the foregoing.

6. "LabCorp," as used herein, means Laboratory Corporation of America Holdings and its domestic or foreign parents, subsidiaries, divisions, affiliates, partnerships, joint ventures, and businesses, wherever located, including but not limited to LabWest, Inc., LabCorp's West Division, National Genetics Institute ("NGI"), Esoterix, and US LABS.

7. "Person," as used herein, means any natural person or any business, legal, or governmental entity or association.

8. "Respondents," as used herein, means LabCorp.

9. Any capitalized terms used but not defined herein shall have the same meaning assigned to them in the Complaint.

### INSTRUCTIONS

1. Furnish all responsive Documents in the possession, custody, or control of the FTC or in the possession, custody, or control of the FTC's representatives and agents.

2. These document requests are continuing in nature. Under FTC Rule of Practice § 3.31(e), You are required to supplement Your responses and produce additional Documents if You obtains further or different information, and LabCorp specifically reserves the right to seek supplementary responses and the additional supplementary production of Documents before the preliminary injunction hearing or before trial.

3. Provide all electronically stored information ("ESI") and hard copy Documents in standard, single-page Group IV TIFF format with accompanying extracted text and metadata in a Concordance load file. Provide Microsoft Access, Excel, and PowerPoint files, as well as audio, audiovisual, and video files, in their native formats. Produce the metadata for any responsive ESI with the responsive data, including the following fields: custodian, author(s), recipient(s), blind copy recipient(s), subject, file sent date/time, file creation date/time, file modification date/time, file last accessed date/time, beginning bates, ending bates, parent beginning bates, attachment(s) beginning bates, hash value, application type, file type, file name, file size, file path, and folder path. Documents produced in native format shall be accompanied by a native link field.

4. Where a claim of privilege is asserted in objecting to any request or sub-part thereof, and any document is withheld (in whole or in part) on the basis of such assertion, You shall provide a log ("Privilege Log") in Excel format that identifies:

- (a) the nature of the privilege (including attorney-client or work product) that is being claimed with respect to each document;
- (b) the type of each document;
- (c) the date of each document;
- (d) the custodian of the document;
- (e) the author of each document;
- (f) any addressees and recipients of each document (including those recipients cc-ed or bcc-ed);
- (g) a description of each document containing sufficient information to identify the general subject matter of the document and to enable LabCorp and the Court to assess the applicability of the privilege claimed, in accordance with Fed. R. Civ. P. 26; and
- (h) the identity of any attachment(s), enclosure(s), cover letter(s), or cover email(s) of each document.

Attachments, enclosures, cover letters, and cover emails shall be entered separately on the Privilege Log. The Privilege Log shall include the full name, title, and employer of each author, addressee, and recipient, denoting each attorney with an asterisk. Submit all non-privileged portions of any responsive document (including non-privileged or redactable attachments, enclosures, cover letters, and cover emails) for which a claim of privilege is asserted, noting where redactions to the document have been made.

5. If the FTC at any time had possession, custody, or control of a document responsive to these requests and if such document, or portion of such document, has been lost, destroyed, purged, or otherwise is not presently in the FTC's possession, custody, or control,

then: (a) identify the authors, addressees, recipients, date, subject matter, and type of document; (b) state the date of its loss, destruction, purge, or separation from the FTC's possession or control; (c) state the circumstances surrounding its loss, destruction, purge, or separation from the FTC's possession or control; and (d) state its present or last known location, including the name, address, and telephone number of each person believed to have possession of such document.

6. If You assert that part of a request is objectionable, respond to the remaining parts of the request to which You do not object. For those portions of any document request to which You object, please state the reason for such objection and describe the Documents or categories of Documents that are not being produced.

7. These document requests shall not be deemed to call for identical copies of documents. "Identical" means precisely the same in all respects; for example, a document with handwritten notes or editing marks shall not be deemed identical to one without such notes or marks.

8. Unless otherwise indicated, the time period covered by these document requests is from January 1, 2008, and continuing in the future throughout the existence of this Action. To the extent any document request uses the phrase "at any time" or otherwise indicates that this time period does not apply, the request is not limited by this period.

9. The Documents responsive to these requests are to be produced as they were kept in the ordinary course of business and are to be labeled in such a way as to show which files and offices they came from.

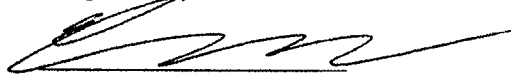
10. In producing documents in connection with these document requests, each document to be produced shall include all attachments, all enclosures, any cover letter(s), and any cover email(s) referred to in the document or originally associated with the document.

11. The specificity of any single request shall not limit the generality of any other request.

12. Unless clearly indicated otherwise: (a) the use of a verb in any tense shall be construed as the use of that verb in all other tenses; (b) the use of the feminine, masculine, or neuter genders shall include all genders; and (c) the singular form of a word shall include the plural and vice versa.

Dated: December 17, 2010

Respectfully Submitted,



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*Attorneys for Laboratory Corporation of America  
and Laboratory Corporation of America Holdings*

# Exhibit B



The FTC hereby reserves the right to raise and rely upon such other and further objections as may become apparent during the course of responding to discovery.

The FTC objects to this Request to the extent it expressly or impliedly seeks information protected from discovery by the attorney-client privilege, the attorney work product doctrine, self evaluative privilege, audit privilege, government deliberative process privilege, government informant privilege or other privileges or reasons for non-production. Documents and information covered by such privileges are not subject to disclosure. Inadvertent disclosure of privileged information is not intended to be, and may not be construed as, a waiver of any applicable privilege. These objections include but are not limited to the following:

- a. On the basis of the work product doctrine and attorney-client privilege, the FTC objects to this Request to the extent it calls for the production of notes, data compilations or summaries, internal communications, internal forms, or memoranda of FTC attorneys and staff or correspondence and documents exchanged between the FTC and its agents or non-testifying experts;
- b. On the basis of the work product doctrine, attorney-client privilege, and government deliberative process privilege, the FTC objects to this Request to the extent it calls for the production of any communications, memoranda, or documents between FTC attorneys or staff or between FTC attorneys or staff and FTC Commissioners or their staff;
- c. On the basis of government informant privilege, the FTC objects to this Request to the extent it calls for the production of complaints or documents received from confidential government informants or documents that necessarily would identify the informants.



The FTC objects to this Request to the extent it expressly or impliedly seeks proprietary, confidential, financial, trade secret or commercially sensitive information from third parties that could harm third parties' competitive or business positions or result in a breach of the FTC's obligation to maintain the confidentiality of such information. Any confidential or proprietary information will be produced pursuant to the Protective Order agreed to by the parties in this matter dated December 1, 2010, the Order of ALJ Chappell dated December 1, 2010, and the Order Granting Joint Motion for a Stipulated Protective Order in the federal action dated January 4, 2011.

The FTC objects to this Request to the extent that it would require the FTC to search and/or provide information from every current and former employee of the FTC as generally overbroad and unduly burdensome, and for the independent reason that such requests are premature, overbroad, unduly burdensome, and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

The FTC objects to the definitions of the "FTC," "You," and "Your" as overbroad and unduly burdensome to the extent they include parties other than the FTC or its employees.

The FTC reserves the right to redact all irrelevant, privileged, or otherwise protected material in the documents that it produces in this action.

The FTC objects to this Request to the extent responsive information is contained in or can be derived from Defendants' own documents and data and the burden and expense of deriving or ascertaining such information is substantially the same for Defendants as it is for the FTC.

Subject to and without waiving these objections, the FTC has produced all responsive, non-privileged documents that are identified in the FTC's initial disclosures made pursuant to

FTC Rule of Practice § 3.31(b) as exhibits to the FTC's Motion for Preliminary Injunction, and in conjunction with its Administrative Action Initial Disclosures on December 23, 2010, December 30, 2010, January 6, 2011, January 7, 2011, January 11, 2011 and January 13, 2011. Because of objections by certain third parties to production of their materials, the FTC will produce additional responsive documents once any pending motion related to those objections is decided and/or the time for seeking further protection by the notified third parties has elapsed. The FTC has answered this Request to the best of its knowledge at the present time, based upon its investigation to date. The FTC states that its investigation is ongoing, and the FTC specifically reserves the right to supplement and amend this response, including the interposition of additional or different objections, when and if it becomes necessary.

Dated: January 18, 2011

Respectfully submitted,

By: Tom Greene/ftc

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# Exhibit C

Plaintiff's First Privilege Log in Response to Defendants' First Request for Documents to Plaintiff					
This log does not contain communications within the Federal Trade Commission. The Federal Trade Commission has not required Hogan Lovells US LLP to produce a privilege log containing internal correspondence and will not require one in the future during the pendency of this action. Plaintiff reserves the right to supplement this privilege log as necessary.					
BEGBATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN
FTC-LCAREV-001459	FTC-LCAREV-001459			6/9/2010	J KLARFELD
FTC-LCAREV-001674	FTC-LCAREV-001674	FTC-LCAREV-001674	FTC-LCAREV-001675	8/23/2010	L DIMARCHISLEIGH
FTC-LCAREV-001675	FTC-LCAREV-001675	FTC-LCAREV-001674	FTC-LCAREV-001675		L DIMARCHISLEIGH
FTC-LCAREV-004232	FTC-LCAREV-004232			9/23/2010	
FTC-LCAREV-004233	FTC-LCAREV-004234			9/23/2010	
FTC-LCAREV-004837	FTC-LCAREV-004837			9/24/2010	
FTC-LCAREV-004911	FTC-LCAREV-004911			10/14/2010	
FTC-LCAREV-004912	FTC-LCAREV-004912			10/14/2010	
FTC-LCAREV-005721	FTC-LCAREV-005721			10/15/2010	
FTC-LCAREV-007662	FTC-LCAREV-007662			10/28/2010	
FTC-LCAREV-007664	FTC-LCAREV-007664			10/29/2010	
FTC-LCAREV-007673	FTC-LCAREV-007673			11/2/2010	
FTC-LCAREV-007740	FTC-LCAREV-007741			11/2/2010	
FTC-LCAREV-009084	FTC-LCAREV-009084			7/7/2010	
FTC-LCAREV-009085	FTC-LCAREV-009085			7/19/2010	
FTC-LCAREV-009086	FTC-LCAREV-009086			7/19/2010	
FTC-LCAREV-009087	FTC-LCAREV-009087			8/6/2010	
FTC-LCAREV-009088	FTC-LCAREV-009088			8/8/2010	
FTC-LCAREV-009089	FTC-LCAREV-009089			8/9/2010	
FTC-LCAREV-009090	FTC-LCAREV-009090			8/10/2010	
FTC-LCAREV-009091	FTC-LCAREV-009092			8/10/2010	
FTC-LCAREV-009093	FTC-LCAREV-009094			8/10/2010	
FTC-LCAREV-009095	FTC-LCAREV-009096			8/11/2010	
FTC-LCAREV-009097	FTC-LCAREV-009098			8/11/2010	
FTC-LCAREV-009099	FTC-LCAREV-009100			8/11/2010	
FTC-LCAREV-009101	FTC-LCAREV-009101	FTC-LCAREV-009101	FTC-LCAREV-009136	8/16/2010	
FTC-LCAREV-009102	FTC-LCAREV-009102	FTC-LCAREV-009101	FTC-LCAREV-009136		
FTC-LCAREV-009103	FTC-LCAREV-009127	FTC-LCAREV-009101	FTC-LCAREV-009136		
FTC-LCAREV-009128	FTC-LCAREV-009128	FTC-LCAREV-009101	FTC-LCAREV-009136		
FTC-LCAREV-009129	FTC-LCAREV-009129	FTC-LCAREV-009101	FTC-LCAREV-009136		

FTC-LCAREV-009130	FTC-LCAREV-009130	FTC-LCAREV-009101	FTC-LCAREV-009136	
FTC-LCAREV-009131	FTC-LCAREV-009136	FTC-LCAREV-009101	FTC-LCAREV-009136	
FTC-LCAREV-009137	FTC-LCAREV-009137			8/19/2010
FTC-LCAREV-009138	FTC-LCAREV-009138			8/23/2010
FTC-LCAREV-009139	FTC-LCAREV-009139			8/23/2010
FTC-LCAREV-009140	FTC-LCAREV-009140			8/23/2010
FTC-LCAREV-009141	FTC-LCAREV-009141			8/26/2010
FTC-LCAREV-009142	FTC-LCAREV-009142	FTC-LCAREV-009142	FTC-LCAREV-009146	8/27/2010
FTC-LCAREV-009143	FTC-LCAREV-009144	FTC-LCAREV-009142	FTC-LCAREV-009146	
FTC-LCAREV-009145	FTC-LCAREV-009146	FTC-LCAREV-009142	FTC-LCAREV-009146	
FTC-LCAREV-009147	FTC-LCAREV-009148			10/12/2010
FTC-LCAREV-009149	FTC-LCAREV-009150			10/12/2010
FTC-LCAREV-012647	FTC-LCAREV-012647			6/9/2010 S_WILKINSON
FTC-LCAREV-012648	FTC-LCAREV-012648			6/9/2010 S_WILKINSON
FTC-LCAREV-012653	FTC-LCAREV-012653	FTC-LCAREV-012653	FTC-LCAREV-013024	6/10/2010 S_WILKINSON
FTC-LCAREV-013025	FTC-LCAREV-013025			6/10/2010 S_WILKINSON
FTC-LCAREV-013420	FTC-LCAREV-013420			6/14/2010 S_WILKINSON
FTC-LCAREV-013551	FTC-LCAREV-013551	FTC-LCAREV-013551	FTC-LCAREV-013686	6/15/2010 S_WILKINSON
FTC-LCAREV-013785	FTC-LCAREV-013785			6/16/2010 S_WILKINSON
FTC-LCAREV-013792	FTC-LCAREV-013792			6/17/2010 S_WILKINSON
FTC-LCAREV-013795	FTC-LCAREV-013795			6/17/2010 S_WILKINSON
FTC-LCAREV-013902	FTC-LCAREV-013902	FTC-LCAREV-013902	FTC-LCAREV-013908	6/21/2010 S_WILKINSON
FTC-LCAREV-013903	FTC-LCAREV-013908	FTC-LCAREV-013902	FTC-LCAREV-013908	S_WILKINSON
FTC-LCAREV-013910	FTC-LCAREV-013910			6/21/2010 S_WILKINSON
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FTC-LCAREV-013914	FTC-LCAREV-013914			6/22/2010 S_WILKINSON
FTC-LCAREV-013915	FTC-LCAREV-013915			6/22/2010 S_WILKINSON
FTC-LCAREV-013952	FTC-LCAREV-013952	FTC-LCAREV-013952	FTC-LCAREV-013953	6/24/2010 S_WILKINSON
FTC-LCAREV-013953	FTC-LCAREV-013953	FTC-LCAREV-013952	FTC-LCAREV-013953	S_WILKINSON
FTC-LCAREV-013954	FTC-LCAREV-013954			6/24/2010 S_WILKINSON
FTC-LCAREV-014011	FTC-LCAREV-014011	FTC-LCAREV-014011	FTC-LCAREV-014012	6/25/2010 S_WILKINSON
FTC-LCAREV-014012	FTC-LCAREV-014012	FTC-LCAREV-014011	FTC-LCAREV-014012	S_WILKINSON
FTC-LCAREV-014036	FTC-LCAREV-014036			6/29/2010 S_WILKINSON
FTC-LCAREV-014072	FTC-LCAREV-014072			6/30/2010 S_WILKINSON
FTC-LCAREV-014076	FTC-LCAREV-014076			7/1/2010 S_WILKINSON
FTC-LCAREV-014092	FTC-LCAREV-014092	FTC-LCAREV-014092	FTC-LCAREV-014093	7/2/2010 S_WILKINSON
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FTC-LCAREV-014111	FTC-LCAREV-014111			7/2/2010	S	WILKINSON
FTC-LCAREV-014117	FTC-LCAREV-014117			7/6/2010	S	WILKINSON
FTC-LCAREV-014137	FTC-LCAREV-014137			7/7/2010	S	WILKINSON
FTC-LCAREV-014138	FTC-LCAREV-014138			7/7/2010	S	WILKINSON
FTC-LCAREV-014139	FTC-LCAREV-014139			7/7/2010	S	WILKINSON
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FTC-LCAREV-014233	FTC-LCAREV-014233			7/15/2010	S	WILKINSON
FTC-LCAREV-014236	FTC-LCAREV-014236	FTC-LCAREV-014237		7/15/2010	S	WILKINSON
FTC-LCAREV-014237	FTC-LCAREV-014237					
FTC-LCAREV-014238	FTC-LCAREV-014238			7/15/2010	S	WILKINSON
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FTC-LCAREV-014241	FTC-LCAREV-014241	FTC-LCAREV-014413		7/15/2010	S	WILKINSON
FTC-LCAREV-014242	FTC-LCAREV-014413	FTC-LCAREV-014413				
FTC-LCAREV-014414	FTC-LCAREV-014414			7/15/2010	S	WILKINSON
FTC-LCAREV-014415	FTC-LCAREV-014415			7/15/2010	S	WILKINSON
FTC-LCAREV-014416	FTC-LCAREV-014416			7/15/2010	S	WILKINSON
FTC-LCAREV-014419	FTC-LCAREV-014419			7/15/2010	S	WILKINSON
FTC-LCAREV-014613	FTC-LCAREV-014613			7/16/2010	S	WILKINSON
FTC-LCAREV-014617	FTC-LCAREV-014617			7/16/2010	S	WILKINSON
FTC-LCAREV-014640	FTC-LCAREV-014640	FTC-LCAREV-014641		7/19/2010	S	WILKINSON
FTC-LCAREV-014642	FTC-LCAREV-014642			7/19/2010	S	WILKINSON
FTC-LCAREV-014643	FTC-LCAREV-014643			7/19/2010	S	WILKINSON
FTC-LCAREV-014644	FTC-LCAREV-014644			7/19/2010	S	WILKINSON
FTC-LCAREV-014645	FTC-LCAREV-014645			7/19/2010	S	WILKINSON
FTC-LCAREV-014668	FTC-LCAREV-014668			7/20/2010	S	WILKINSON
FTC-LCAREV-014669	FTC-LCAREV-014669			7/21/2010	S	WILKINSON
FTC-LCAREV-014670	FTC-LCAREV-014670			7/21/2010	S	WILKINSON
FTC-LCAREV-014691	FTC-LCAREV-014691	FTC-LCAREV-014692		7/21/2010	S	WILKINSON





FTC-LCAREV-015061	FTC-LCAREV-015061			9/9/2010	S	WILKINSON
FTC-LCAREV-015062	FTC-LCAREV-015062			9/9/2010	S	WILKINSON
FTC-LCAREV-015082	FTC-LCAREV-015082			9/13/2010	S	WILKINSON
FTC-LCAREV-015083	FTC-LCAREV-015083	FTC-LCAREV-015083	FTC-LCAREV-015091	9/14/2010	S	WILKINSON
FTC-LCAREV-015084	FTC-LCAREV-015088	FTC-LCAREV-015083	FTC-LCAREV-015091		S	WILKINSON
FTC-LCAREV-015089	FTC-LCAREV-015091	FTC-LCAREV-015083	FTC-LCAREV-015091		S	WILKINSON
FTC-LCAREV-015104	FTC-LCAREV-015104			9/22/2010	S	WILKINSON
FTC-LCAREV-015107	FTC-LCAREV-015107			9/22/2010	S	WILKINSON
FTC-LCAREV-015110	FTC-LCAREV-015111			9/23/2010	S	WILKINSON
FTC-LCAREV-015112	FTC-LCAREV-015113			9/23/2010	S	WILKINSON
FTC-LCAREV-015123	FTC-LCAREV-015123	FTC-LCAREV-015123	FTC-LCAREV-015144	9/24/2010	S	WILKINSON
FTC-LCAREV-015124	FTC-LCAREV-015144	FTC-LCAREV-015123	FTC-LCAREV-015144		S	WILKINSON
FTC-LCAREV-015145	FTC-LCAREV-015146			9/25/2010	S	WILKINSON
FTC-LCAREV-015147	FTC-LCAREV-015147			9/27/2010	S	WILKINSON
FTC-LCAREV-015148	FTC-LCAREV-015149			9/27/2010	S	WILKINSON
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FTC-LCAREV-015168	FTC-LCAREV-015168			10/11/2010	S	WILKINSON
FTC-LCAREV-015169	FTC-LCAREV-015170			10/11/2010	S	WILKINSON
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FTC-LCAREV-015173	FTC-LCAREV-015174			10/12/2010	S	WILKINSON
FTC-LCAREV-015181	FTC-LCAREV-015181	FTC-LCAREV-015181	FTC-LCAREV-015185	10/13/2010	S	WILKINSON
FTC-LCAREV-015182	FTC-LCAREV-015185	FTC-LCAREV-015181	FTC-LCAREV-015185		S	WILKINSON
FTC-LCAREV-015186	FTC-LCAREV-015186			10/13/2010	S	WILKINSON
FTC-LCAREV-015187	FTC-LCAREV-015187	FTC-LCAREV-015187	FTC-LCAREV-015191	10/13/2010	S	WILKINSON
FTC-LCAREV-015188	FTC-LCAREV-015191	FTC-LCAREV-015187	FTC-LCAREV-015191		S	WILKINSON
FTC-LCAREV-015404	FTC-LCAREV-015404			10/15/2010	S	WILKINSON
FTC-LCAREV-015778	FTC-LCAREV-015778			10/29/2010	S	WILKINSON
FTC-LCAREV-015805	FTC-LCAREV-015805	FTC-LCAREV-015805	FTC-LCAREV-015836	11/18/2010	S	WILKINSON
FTC-LCAREV-015806	FTC-LCAREV-015836				S	WILKINSON
FTC-LCAREV-015837	FTC-LCAREV-015837			11/18/2010	S	WILKINSON
FTC-LCAREV-015993	FTC-LCAREV-015993			12/7/2010	S	WILKINSON
FTC-LCAREV-015994	FTC-LCAREV-015994			12/7/2010	S	WILKINSON
FTC-LCAREV-015995	FTC-LCAREV-015995			12/7/2010	S	WILKINSON
FTC-LCAREV-015996	FTC-LCAREV-015996			12/9/2010	S	WILKINSON
FTC-LCAREV-015997	FTC-LCAREV-015997			12/10/2010	S	WILKINSON
FTC-LCAREV-016002	FTC-LCAREV-016002			12/13/2010	S	WILKINSON
FTC-LCAREV-016625	FTC-LCAREV-016625	FTC-LCAREV-016625	FTC-LCAREV-016797	7/15/2010	Network	Data

FTC-LCAREV-016626	FTC-LCAREV-016797	FTC-LCAREV-016625	FTC-LCAREV-016797		Network Data
FTC-LCAREV-016798	FTC-LCAREV-016798	FTC-LCAREV-016798	FTC-LCAREV-016799	6/25/2010	Network Data
FTC-LCAREV-016799	FTC-LCAREV-016799	FTC-LCAREV-016798	FTC-LCAREV-016799		Network Data
FTC-LCAREV-016802	FTC-LCAREV-016805				Network Data
FTC-LCAREV-016808	FTC-LCAREV-016811				Network Data
FTC-LCAREV-016812	FTC-LCAREV-016812			6/9/2010	Network Data
FTC-LCAREV-016813	FTC-LCAREV-016813	FTC-LCAREV-016813	FTC-LCAREV-016834	9/24/2010	Network Data
FTC-LCAREV-016814	FTC-LCAREV-016834	FTC-LCAREV-016813	FTC-LCAREV-016834		Network Data
FTC-LCAREV-016835	FTC-LCAREV-016855				Network Data
FTC-LCAREV-016856	FTC-LCAREV-016857				Network Data
FTC-LCAREV-016858	FTC-LCAREV-016858	FTC-LCAREV-016858	FTC-LCAREV-017229	6/10/2010	Network Data
FTC-LCAREV-016859	FTC-LCAREV-016866				Network Data
FTC-LCAREV-016867	FTC-LCAREV-017029				Network Data
FTC-LCAREV-017030	FTC-LCAREV-017122				Network Data
FTC-LCAREV-017123	FTC-LCAREV-017149				Network Data
FTC-LCAREV-017150	FTC-LCAREV-017222				Network Data
FTC-LCAREV-017223	FTC-LCAREV-017229				Network Data
FTC-LCAREV-017230	FTC-LCAREV-017230			6/9/2010	Network Data
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FTC-LCAREV-026146	FTC-LCAREV-026146			12/20/2010	S_WILKINSON
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FTC-LCAREV-026149	FTC-LCAREV-026150			12/20/2010	S_WILKINSON
FTC-LCAREV-026151	FTC-LCAREV-026152			12/20/2010	S_WILKINSON
FTC-LCAREV-026162	FTC-LCAREV-026163			12/20/2010	S_WILKINSON
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FTC-LCAREV-026438	FTC-LCAREV-026438			7/13/2010	
FTC-LCAREV-026439	FTC-LCAREV-026439			7/19/2010	
FTC-LCAREV-026698	FTC-LCAREV-026698	FTC-LCAREV-026698	FTC-LCAREV-026699	7/19/2010	
FTC-LCAREV-026699	FTC-LCAREV-026699	FTC-LCAREV-026698	FTC-LCAREV-026699	7/2/2010	
FTC-LCAREV-026700	FTC-LCAREV-026700	FTC-LCAREV-026700	FTC-LCAREV-026701	7/6/2010	
FTC-LCAREV-026701	FTC-LCAREV-026701				
FTC-LCAREV-026702	FTC-LCAREV-026702	FTC-LCAREV-026702	FTC-LCAREV-026733	8/13/2010	
FTC-LCAREV-026703	FTC-LCAREV-026717	FTC-LCAREV-026702	FTC-LCAREV-026733		
FTC-LCAREV-026718	FTC-LCAREV-026733	FTC-LCAREV-026702	FTC-LCAREV-026733		
FTC-LCAREV-026734	FTC-LCAREV-026734	FTC-LCAREV-026734	FTC-LCAREV-026742	9/14/2010	
FTC-LCAREV-026735	FTC-LCAREV-026739	FTC-LCAREV-026734	FTC-LCAREV-026742		
FTC-LCAREV-026740	FTC-LCAREV-026742	FTC-LCAREV-026734	FTC-LCAREV-026742		

FTC-LCAREV-026743	FTC-LCAREV-026744			9/14/2010
FTC-LCAREV-026745	FTC-LCAREV-026746			9/27/2010
FTC-LCAREV-026747	FTC-LCAREV-026749			9/27/2010
FTC-LCAREV-026750	FTC-LCAREV-026750			10/6/2010
FTC-LCAREV-026751	FTC-LCAREV-026751	FTC-LCAREV-026752		10/8/2010
FTC-LCAREV-026752	FTC-LCAREV-026752	FTC-LCAREV-026752		
FTC-LCAREV-026753	FTC-LCAREV-026754			10/11/2010
FTC-LCAREV-026755	FTC-LCAREV-026757			10/11/2010
FTC-LCAREV-026758	FTC-LCAREV-026758	FTC-LCAREV-026758		10/13/2010
FTC-LCAREV-026759	FTC-LCAREV-026762	FTC-LCAREV-026758		
FTC-LCAREV-026763	FTC-LCAREV-026763	FTC-LCAREV-026763		10/13/2010
FTC-LCAREV-026764	FTC-LCAREV-026767	FTC-LCAREV-026767		
FTC-LCAREV-026768	FTC-LCAREV-026768			10/14/2010
FTC-LCAREV-026769	FTC-LCAREV-026770			10/14/2010
FTC-LCAREV-026771	FTC-LCAREV-026772			10/14/2010
FTC-LCAREV-026773	FTC-LCAREV-026774			10/14/2010
FTC-LCAREV-026775	FTC-LCAREV-026776			10/14/2010
FTC-LCAREV-026777	FTC-LCAREV-026779			10/14/2010
FTC-LCAREV-026780	FTC-LCAREV-026781			10/15/2010
FTC-LCAREV-026782	FTC-LCAREV-026784			10/27/2010
FTC-LCAREV-026785	FTC-LCAREV-026785			10/29/2010
FTC-LCAE-000642	FTC-LCAE-000642	FTC-LCAE-000642	FTC-LCAE-000643	J_KLARFELD
FTC-LCAE-000643	FTC-LCAE-000643			J_KLARFELD

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'Penny Nagler' <Penny.Nagler@doj.ca.gov>; 'Winston Chen' <Winston.Chen@doj.ca.gov> Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>
Natalie Manzo <Natalie.Manzo@doj.ca.gov>; Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Wilkinson, Stephanie
Knowing, Mackenzie <mknowling@ftc.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Knowing, Mackenzie <mknowling@ftc.gov>
'Penny Nagler' <Penny.Nagler@doj.ca.gov>; Knowing, Mackenzie <mknowling@ftc.gov>; Teich, Matthew <mteich@ftc.gov>
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Natalie Manzo <Natalie.Manzo@doj.ca.gov>; Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Greene, Tom <tgri
Moiseyev, Michael R. <MMOISEYEV@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
'Natalie Manzo' <Natalie.Manzo@doj.ca.gov>; 'Penny Nagler' <Penny.Nagler@doj.ca.gov>; Greene, Tom <tgreene2@ftc.gov>
Natalie Manzo <Natalie.Manzo@doj.ca.gov>; Penny Nagler <Penny.Nagler@doj.ca.gov>
'Natalie Manzo' <Natalie.Manzo@doj.ca.gov>; 'Penny Nagler' <Penny.Nagler@doj.ca.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>
'Penny Nagler' <Penny.Nagler@doj.ca.gov>; 'Winston Chen' <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Bovee, Ste
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Bovee, Step
Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
'Winston Chen' <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>
Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>
'Penny.Nagler@doj.ca.gov'; 'Winston.Chen@doj.ca.gov'
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>
Natalie Manzo <Natalie.Manzo@doj.ca.gov>

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Natalie Manzo <Natalie.Manzo@doj.ca.gov>; Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Greene, Tom <tgrr

Moiseyev, Michael R. <MMOISEYEV@ftc.gov>; Klarfeld, Jonathan <JKLARFELD@ftc.gov>; Long, Randall <RLONG@ftc.gov>

'Brian Keats' <Brian.Keats@doj.ca.gov>; 'Dennis Fenwick' <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>; Moiseyev, M  
'Natalie Manzo' <Natalie.Manzo@doj.ca.gov>; 'Penny Nagler' <Penny.Nagler@doj.ca.gov>

'Winston Chen' <Winston.Chen@doj.ca.gov>

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'Natalie Manzo' <Natalie.Manzo@doj.ca.gov>; 'Penny Nagler' <Penny.Nagler@doj.ca.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov> com>
Brian Keats <Brian.Keats@doj.ca.gov>; Klarfeld, Jonathan <JKLARFELD@ftc.gov>
Natalie Manzo <Natalie.Manzo@doj.ca.gov>; Penny Nagler <Penny.Nagler@doj.ca.gov>
'Natalie Manzo' <Natalie.Manzo@doj.ca.gov>; 'Penny Nagler' <Penny.Nagler@doj.ca.gov>
Penny Nagler <Penny.Nagler@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>
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Winston Chen <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>
Frank Banueloz <Frank.Banueloz@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>
'Frank Banueloz' <Frank.Banueloz@doj.ca.gov>
'Frank Banueloz' <Frank.Banueloz@doj.ca.gov>; Velikson, Igor <ivelikson@ftc.gov>
Frank Banueloz <Frank.Banueloz@doj.ca.gov>; Velikson, Igor <ivelikson@ftc.gov>
Frank Banueloz <Frank.Banueloz@doj.ca.gov>; Winston Chen <Winston.Chen@doj.ca.gov>; Velikson, Igor <ivelikson@ftc.gov>
'Frank Banueloz' <Frank.Banueloz@doj.ca.gov>; Velikson, Igor <ivelikson@ftc.gov>
Demarchi Sleigh, Lisa <ldemarchisleigh@ftc.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>

















Description
Email from Vincent DiCarlo, attorney at California Attorney General's Office, to Jonathan Klarfeld regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Winston Chen to Lisa Demarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Winston Chen to Lisa Demarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Matthew Teich to Natalie Manzo, Winston Chen and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Natalie Manzo and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Matthew Teich regarding investigation of LabCorp's purchase of Westcliff
Email from Matthew Teich to Natalie Manzo, Winston Chen and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Email from Penny Nagler to Matthew Teich regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Natalie Manzo, Penny Nagler and Matthew Teich regarding investigation of LabCorp's purchase of Westcliff
Email from Matthew Teich to Natalie Manzo, Winston Chen and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Natalie Manzo, Penny Nagler and Matthew Teich regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Matthew Teich regarding investigation of LabCorp's purchase of Westcliff
Email from Matthew Teich to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to Lisa Demarchi Sleigh, Dilyara Yechshanova, Julie Carlson, James Southworth, Mackenzie Knowing, Mitchell Meneau, Stepah
Email from Natalie Manzo to Lisa Demarchi Sleigh, Dilyara Yechshanova, Julie Carlson, James Southworth, Mackenzie Knowing, Mitchell Meneau, Stepah
Email from Natalie Manzo to Stephanie Bovee regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Stephanie Bovee, Natalie Manzo and Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to Winston Chen, Stephanie Bovee and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Natalie Manzo, Stephanie Bovee and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Natalie Manzo, Stephanie Bovee and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Natalie Manzo, Stephanie Bovee and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We
Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We
Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We
Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We



Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We  
Attachment to email from Stephanie Wilkinson to Winston Chen, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of We  
Email from Natalie Manzo to Lisa Demarch Sleigh, Stephanie Bovee, Stephanie Wilkinson, Penny Nagler and Winston Chen regarding investigation of Lab  
Email from Winston Chen to Stephanie Wilkinson, Natalie Manzo and Stephanie Bovee regarding investigation of LabCorp's purchase of Westcliff  
Email from Stephanie Wilkinson to Winston Chen, Natalie Manzo, Penny Nagler and Stephanie Bovee regarding investigation of LabCorp's purchase of We  
Email from Natalie Manzo to Winston Chen, Stephanie Wilkinson, Penny Nagler and Stephanie Bovee regarding investigation of LabCorp's purchase of We  
Email from Winston Chen to Stephanie Bovee regarding investigation of LabCorp's purchase of Westcliff  
Attachment to email from Winston Chen to Lisa Demarchi Sleigh, Stephanie Bovee, Stephanie Wilkinson and Winston Chen regarding investigation of LabCorp's purchas  
Attachment to email from Winston Chen to Lisa Demarchi Sleigh, Stephanie Bovee, Stephanie Wilkinson and Winston Chen regarding investigation of Lab  
Email from Stephanie Wilkinson to Natalie Manzo, Penny Nagler, Winston Chen, Lisa Demarchi Sleigh, Stephanie Bovee, Stephanie Wilkinson and Winston Chen regarding investigation of Lab  
Email from Natalie Manzo to Stephanie Wilkinson, Penny Nagler, Winston Chen, Lisa Demarchi Sleigh and Stephanie Bovee regarding investigation of Lab  
Email from Vincent DiCarlo to Jonathan Klarfeld, Brian Keats, Dennis Fenwick and Stephanie Wilkinson regarding investigation of LabCorp's purchase of V  
Email from Vincent DiCarlo to Jonathan Klarfeld, Brian Keats, Dennis Fenwick and Stephanie Wilkinson regarding investigation of LabCorp's purchase of V  
Email from Stephanie Wilkinson to Kathleen Foote, Michael Moiseyev, Jonathan Klarfeld and Randall Long regarding investigation of LabCorp's purchase of V  
Email from Kathleen Foote to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff; attachment produced  
Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff  
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Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
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Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff  
Email from Stephanie Wilkinson to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff  
Attachment to email from Stephanie Wilkinson to Natalie Manzo, Karen Berg, William Golden and Jonathan Klarfeld regarding investigation of LabCorp's purchase of We  
Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Email from Natalie Manzo to William Golden and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Attachment to email from Natalie Manzo to William Golden and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Email from Natalie Manzo to William Golden, Stephanie Wilkinson, Jonathan Klarfeld and Karen Berg regarding investigation of LabCorp's purchase of We  
Email from Stephanie Wilkinson to Natalie Manzo and Jonathan Klarfeld regarding investigation of LabCorp's purchase of Westcliff  
Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Voicemail from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff  
Voicemail from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff







Attachement to email from Winston Chen to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to William Golden regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Natalie Manzo to William Golden regarding investigation of LabCorp's purchase of Westcliff
Office of the Attorney General's Description of the Medi-Cal Program
Memorandum on the Moratorium of the Enrollment of Clinical Laboratory Providers
Email from Vincent DiCarlo to Jonathan Klarfeld regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Settlement agreement in Qui Tam case
Settlement agreement in Qui Tam case
Letter from David Shonka to Natalie Manzo regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Kathleen Foote, Michael Moiseyev, Jonathan Klarfeld and Randall Long regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Stephanie Wilkinson to Kathleen Foote regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Stephanie Wilkinson to Kathleen Foote regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Stephanie Wilkinson to Kathleen Foote regarding investigation of LabCorp's purchase of Westcliff
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Attachment to email from Stephanie Wilkinson to Kathleen Foote regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Stephanie Wilkinson to Kathleen Foote regarding investigation of LabCorp's purchase of Westcliff
Email from Jonathan Klarfeld to Vincent DiCarlo regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Penny Nagler to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Nagler to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Julie Carlson and Mackenzie Knowing regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Lisa DeMarchi Sleigh to Natalie Manzo and Winsten Chen regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Lisa DeMarchi Sleigh to Natalie Manzo and Winsten Chen regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Lisa DeMarchi Sleigh to Natalie Manzo and Winsten Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Winsten Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Winsten Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Winsten Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff

Email from Lisa DeMarchi Sleigh to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Lisa DeMarchi Sleigh to Vincent DiCarlo regarding investigation of LabCorp's purchase of Westcliff
Email from Vincent DiCarlo to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh and Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Stephanie Wilkinson to Winston Chen and Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Natalie Manzo to Stephanie Wilkinson regarding investigation of LabCorp's purchase of Westcliff
Email from Sandra Tinson to Natalie Manzo and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Sandra Tinson to Natalie Manzo and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Email from Sandra Tinson to Natalie Manzo and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Attachment to email from Sandra Tinson to Natalie Manzo and Penny Nagler regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Lisa DeMarchi Sleigh to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Lisa DeMarchi Sleigh to Winston Chen regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
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Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Email from Winston Chen to Lisa DeMarchi Sleigh regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Vincent DiCarlo to Jonathan Klarfeld regarding investigation of LabCorp's purchase of Westcliff
Voice mail from Vincent DiCarlo to Jonathan Klarfeld regarding investigation of LabCorp's purchase of Westcliff



















## Exhibit D

Plaintiff's Amended First Privilege Log in Response to Defendants' First Request for Documents to Plaintiff and Respondents' First Request for Documents to Federal Trade Commission												
This privilege log does not contain communications within the Federal Trade Commission. The Federal Trade Commission has not required Hogan Lovells US LLP to produce a privilege log containing internal correspondence and will not require one in the future during the pendency of this action. Plaintiff reserves the right to supplement this privilege log as necessary.												
BEGBATES	ENDOBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-001459	FTC-LCAREV-001459			6/9/2010	J. KLAREFELD	Purchase of Westcliff Medical Laboratories, Inc.htm	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	Vincent DiCarlo* <Vincent.DiCarlo@doj.ca.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Dennis Fenwick <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-001674	FTC-LCAREV-001674			8/23/2010	L. DIMARCHISL	VM: (213) 897-6464.msg	Demarchi Sleigh, Lisa* <ldemarchisleigh@ftc.gov>	Adomo Voice Messaging <adomovm@ftc.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-001675	FTC-LCAREV-001675				L. DIMARCHISL	Voice_Message_Recording_S164281_001_9.sm.wav					MS Windows Wave Sound (Intel)	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-004232	FTC-LCAREV-004232			9/23/2010	M. TEICH	CD Instructions.htm	Natalie manzo@doj.ca.gov*	Teich, Matthew <mteich@ftcexchange.com>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-004233	FTC-LCAREV-004233			9/23/2010	M. TEICH	RE: LabCorpWestcliff Transcripts.htm	Natalie Manzo* <Natalie_manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Teich, Matthew <mteich@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-004837	FTC-LCAREV-004837			9/24/2010	M. TEICH	Re: CD Instructions.htm	Teich, Matthew <mteich@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-004911	FTC-LCAREV-004911			10/14/2010	M. TEICH	Second CD Instructions.htm	Natalie manzo@doj.ca.gov*	Teich, Matthew <mteich@ftcexchange.com>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-004912	FTC-LCAREV-004912			10/14/2010	M. TEICH	Re: Second CD Instructions.htm	Teich, Matthew <mteich@ftc.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-005721	FTC-LCAREV-005721			10/15/2010	M. TEICH	Re: Second CD Instructions.htm	Natalie Manzo* <Natalie_manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-007662	FTC-LCAREV-007662			10/28/2010	M. TEICH	Lab Corp/Westcliff Docs.htm	Natalie Manzo <Natalie_manzo@doj.ca.gov>	Teich, Matthew <mteich@ftcexchange.com>	Demarchi Sleigh, Lisa* <ldemarchisleigh@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEGBATES/ ENDBATES/ LCAREV- [ID]	BEGATTACH/ ENDTTACH/ [ID]	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC- LCAREV- 007664		10/29/2010	M. TEICH	Re: Lab Corp/Westcliff Docs.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 007673		11/2/2010	M. TEICH	Re: Lab Corp/Westcliff Docs.htm	Teich, Matthew <mteich@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 007740		11/2/2010	M. TEICH	RE: Lab Corp/Westcliff Docs.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Teich, Matthew <mteich@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009084		7/7/2010	S. BOVEE	RE: Medi-Cal Provider numbers.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechstanova, Dilyara <dilyarayanova@ftc.gov>; Carlson, Julie A. <jdecourcy@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Michael <meneau@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Carlson, Julie A. <jdecourcy@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine	
FTC- LCAREV- 009085		7/19/2010	S. BOVEE	Call in Number for call with Third Party	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege



BEGBATES, ENDBATES, BEGATTACH, ENDATTACH, DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-009086			Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi, Leigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <yeichshanova@ftc.gov>; Carlson, Julie A. <jdeourycarlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Mitchell <mmeneau@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009087	7/19/2010 S_BOVEE	Re: Call in Number for call with Third Party		Natalie Manzo* <Natalie.manzo@doj.ca.gov>				
FTC-LCAREV-009088	8/6/2010 S_BOVEE	Re: FTC investigation of LabCorp.htm	Bovee, Stephanie* C. <SBOVEE@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009089	8/8/2010 S_BOVEE	RE: FTC investigation of LabCorp.htm	Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Winston Chen* <Winston.Chen@doj.ca.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009090	8/9/2010 S_BOVEE	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009091	8/10/2010 S_BOVEE	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>; Winston Chen* <Winston.Chen@doj.ca.gov>; Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009093	8/10/2010 S_BOVEE	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009095	8/11/2010 S_BOVEE	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

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FTC-LCAREV-009097	FTC-LCAREV-009098	8/11/2010	S_BOVEE	RE: FTC investigation of LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009099	FTC-LCAREV-009100	8/11/2010	S_BOVEE	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009101	FTC-LCAREV-009136	8/16/2010	S_BOVEE	LabCorp/Westcliff Maps.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Bovee, Stephanie* C. <SBOVEE@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009102	FTC-LCAREV-009136		S_BOVEE	Northern CA Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009103	FTC-LCAREV-009136		S_BOVEE	Southern CA County Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009128	FTC-LCAREV-009136		S_BOVEE	Westcliff CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009129	FTC-LCAREV-009136		S_BOVEE	LabCorp CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009130	FTC-LCAREV-009136		S_BOVEE	LabCorp Southern CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009131	FTC-LCAREV-009136		S_BOVEE	Northern CA County Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009137	FTC-LCAREV-009137	8/19/2010	S_BOVEE	Interview with Third Party notes	Demarchi Sleight, Lisa* <ldemarchis@ftc.gov> Bovee, Stephanie* C. <SBOVEE@ftc.gov> Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-009138	FTC-LCAREV-009138	8/23/2010	S_BOVEE	Meeting with LapCorp.htm	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-009139	FTC-LCAREV-009139	8/23/2010	S_BOVEE	RE: Meeting with LapCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

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FTC- LCAREV- 009140			8/23/2010	S. BOVEE	RE: Meeting with LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>;	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009141			8/26/2010	S. BOVEE	Discussion regarding LabCorp's purchase of Westcliff	Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Demarchi Sleigh, Lisa* <ldemarchisleigh@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009142	FTC-LCAREV- 008142	FTC-LCAREV- 009146	8/27/2010	S. BOVEE	LA and Orange County Maps.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009143	FTC-LCAREV- 009142	FTC-LCAREV- 009146		S. BOVEE	OC Map.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009144	FTC-LCAREV- 009142	FTC-LCAREV- 009146		S. BOVEE	LA Map.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009145	FTC-LCAREV- 009142	FTC-LCAREV- 009146		S. BOVEE							
FTC- LCAREV- 009146	FTC-LCAREV- 009142	FTC-LCAREV- 009146		S. BOVEE							
FTC- LCAREV- 009147	FTC-LCAREV- 009148		10/12/2010	S. BOVEE	RE: LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>; Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <ldemarchisleigh@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 009148											
FTC- LCAREV- 009149	FTC-LCAREV- 009150		10/12/2010	S. BOVEE	RE: LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>; Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <ldemarchisleigh@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 012647	FTC-LCAREV- 012647		6/9/2010	S. WILKINSON	Purchase of Westcliff Medical Laboratories, Inc. .htm	Klarfeld, Jonathan** <JKLARFELD@ftc.gov>	Vincent DiCarlo* <Vincent.DiCarlo@doj.ca.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Dennis Fenwick <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 012648	FTC-LCAREV- 012648		6/9/2010	S. WILKINSON	Purchase of Westcliff Medical Laboratories, Inc. .htm	Klarfeld, Jonathan** <JKLARFELD@ftc.gov>	Vincent DiCarlo* <Vincent.DiCarlo@doj.ca.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Dennis Fenwick <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

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FTC-LCAREV-012653	FTC-LCAREV-012653	FTC-LCAREV-013024	6/10/2010	S. WILKINSON	Quest Unilab and bankruptcy filings	Kathleen Foote<doj.ca.gov>	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Mosseyev, Michael R. <MMOISEYEV@ftc.gov>; Klarfeld, Jonathan <JKLARFELD@ftc.gov>; Long, Randall <RLONG@ftc.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013025			6/10/2010	S. WILKINSON	Quest Unilab and bankruptcy filings	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Kathleen Foote <kathleen.foote@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013420			6/14/2010	S. WILKINSON	Westciff/Lab Corp Matter.htm	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013551	FTC-LCAREV-013551	FTC-LCAREV-013686	6/15/2010	S. WILKINSON	RE: Westciff/Lab Corp Matter.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013785			6/16/2010	S. WILKINSON	RE: Westciff/Lab Corp Matter.htm	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013792			6/17/2010	S. WILKINSON	RE: Westciff/Lab Corp Matter.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013795			6/17/2010	S. WILKINSON	RE: Westciff/Lab Corp Matter.htm	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013902	FTC-LCAREV-013902	FTC-LCAREV-013908	6/21/2010	S. WILKINSON	Case Cites.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013903	FTC-LCAREV-013908	FTC-LCAREV-013908		S. WILKINSON	Bankruptcy Analysis.wpd					WordPerfect Document	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013910			6/21/2010	S. WILKINSON	Re: Case Cites.htm	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013913			6/22/2010	S. WILKINSON	Timelines, etc. .htm	Wilkinson, Stephanie A. <swilkinson@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013914			6/22/2010	S. WILKINSON	RE: Timelines, etc. .htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

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FTC-LCAREV-013915		6/22/2010	S. WILKINSON	RE: Timelines, etc. .htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013952	FTC-LCAREV-013952	6/24/2010	S. WILKINSON	Coordination of investigations	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	<KBERG@ftc.gov>; Golden, William* P. <BGOLDEN@ftc.gov>; Klarfeld, Jonathan** <JKLARFELD@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013953	FTC-LCAREV-013953		S. WILKINSON	Form 712.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-013954		6/24/2010	S. WILKINSON	Coordination of investigations	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014011	FTC-LCAREV-014011	6/25/2010	S. WILKINSON	Form 712.htm	Golden, William* P. <BGOLDEN@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014012	FTC-LCAREV-014012		S. WILKINSON	Signed FTC Form 712.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014036		6/29/2010	S. WILKINSON	Coordination of investigations	Golden, William* P. <BGOLDEN@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>; Berg, Karen E* <KBERG@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014072		6/30/2010	S. WILKINSON	Investigation Coordination.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014076		7/1/2010	S. WILKINSON	Tomorrow's Interview.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014092	FTC-LCAREV-014092	7/2/2010	S. WILKINSON	VM: (213) 897-2707.msg	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Adomo Voice Messaging <adomovm@ftc.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014093	FTC-LCAREV-014093		S. WILKINSON	Voice_Message_Recording_S488715_001_g					MS Windows Wave Sound (Intel)	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014094		7/2/2010	S. WILKINSON	Next Week.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEGGATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-014111	FTC-LCAREV-014111			7/2/2010	S. WILKINSON	Scheduling call with Third Party	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014117	FTC-LCAREV-014117			7/6/2010	S. WILKINSON	Medi-Cal Provider numbers.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014137	FTC-LCAREV-014137			7/7/2010	S. WILKINSON	RE: Medi-Cal Provider numbers.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Winston Chen* <Winston.Chen@doj.ca.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Carlson, Julie A. <dcourtycarlson@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014138	FTC-LCAREV-014138			7/7/2010	S. WILKINSON	Calendar item regarding interview with third party	Knowing, Mackenzie <mknowling@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014139	FTC-LCAREV-014139			7/7/2010	S. WILKINSON	RE: Medi-Cal Provider numbers.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014140	FTC-LCAREV-014140			7/7/2010	S. WILKINSON	LabCorpWestCliff.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014211	FTC-LCAREV-014211			7/12/2010	S. WILKINSON	Response to calendar item regarding interview with third party	Meneau, Mitchell <mmeaneu@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014212	FTC-LCAREV-014212			7/12/2010	S. WILKINSON	Response to calendar item regarding interview with third party	Knowing, Mackenzie <mknowling@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014217	FTC-LCAREV-014217			7/12/2010	S. WILKINSON	Re: Updated call	Meneau, Mitchell <mmeaneu@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege

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FTC- LCAREV- 014219			7/13/2010	S. WILKINSON	LabCorp/Westicliff Discussion.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 014220			7/13/2010	S. WILKINSON	Re: LabCorp/Westicliff Discussion.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 014221			7/14/2010	S. WILKINSON	RE: LabCorp/Westicliff Discussion.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 014223			7/14/2010	S. WILKINSON	RE: LabCorp/Westicliff Discussion.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 014232			7/14/2010	S. WILKINSON	Response to calendar item regarding interview with third party	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014233			7/15/2010	S. WILKINSON	Response to calendar item regarding interview with third party	Winston Chen* <Winston.Chen@doj.ca.gov>; Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014236		FTC-LCAREV- 014236	7/15/2010	S. WILKINSON	Updated calendar item regarding interview with third party	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014237				S. WILKINSON	Response to updated calendar item regarding interview with third party					MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014238			7/16/2010	S. WILKINSON	Updated calendar item regarding interview with third party	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege

BEGGATES/ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-014239			7/15/2010	S. WILKINSON	Response to email discussing third party call	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen <Winston.Chen@doj.ca.gov>	Meneau, Mitchell <mmeneau@ftc.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014241	FTC-LCAREV-014241		7/15/2010	S. WILKINSON	Response to email discussing third party call	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen <Winston.Chen@doj.ca.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014242	FTC-LCAREV-014241										
FTC-LCAREV-014414				S. WILKINSON	IPA List.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014415	FTC-LCAREV-014413		7/15/2010	S. WILKINSON	LabCorp's Counsel.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014416			7/15/2010	S. WILKINSON	List of Physicians Groups	Winston Chen <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Natalie Manzo <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-014419			7/15/2010	S. WILKINSON	RE: LabCorp's Counsel.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Winston Chen <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014613			7/15/2010	S. WILKINSON	RE: LabCorp's Counsel.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Winston Chen <Winston.Chen@doj.ca.gov>	Winston Chen <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014617			7/16/2010	S. WILKINSON	Dial in for Meeting.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014640	FTC-LCAREV-014641		7/16/2010	S. WILKINSON	LabCorp document request.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen <Winston.Chen@doj.ca.gov>	Natalie Manzo <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014640			7/19/2010	S. WILKINSON	Confirming conference call with third party	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege



BEGBATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC- LCAREV- 014642	FTC- LCAREV- 014642			7/19/2010	S. WILKINSON	Confirming conference call with third party	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014643	FTC- LCAREV- 014643			7/19/2010	S. WILKINSON	Confirming conference call with third party	Winston Chen* <Winston.Chen@doj.ca.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourcy@carlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Mitchell <mmeneau@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014644	FTC- LCAREV- 014644			7/19/2010	S. WILKINSON	Dial in number for conference call with third party	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourcy@carlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Mitchell <mmeneau@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014645	FTC- LCAREV- 014645			7/19/2010	S. WILKINSON	Confirming dial in number for conference call with third party	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourcy@carlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Mitchell <mmeneau@ftc.gov>; Bovee, Stephanie* C. <SBOVEE@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 014668	FTC- LCAREV- 014668			7/20/2010	S. WILKINSON	Ques. re 11:00 a.m. EDT Call tomorrow.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege

BEGGATES/ ENDBATES/ LCAREV-014689	BEGATTACH/ ENDTATCH/ LCAREV-014689	DATES/ DATESENT/ 7/21/2010	CUSTODIAN/ S. WILKINSON	FILE NAME/ DESCRIPTION/ RE: Ques. re 11:00 a.m. EDT Call tomorrow.htm	TO/ Natalie Manzo* <Natalie.manzo@doj.ca.gov>	FROM/ Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	CC/ Winston Chen* <Winston.Chen@doj.ca.gov>	BCC/ N/A	FILETYPE/ HyperText Markup Language	Basis for Withholding/ Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014670	FTC- LCAREV-014670	7/21/2010	S. WILKINSON	RE: Ques. re 11:00 a.m. EDT Call tomorrow.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014691	FTC- LCAREV-014691	7/21/2010	S. WILKINSON	Accepted: calendar item	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014692	FTC- LCAREV-014692	7/21/2010	S. WILKINSON	not supported calendar message.ics	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	Virtual Calendar File	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014693	FTC- LCAREV-014693	7/21/2010	S. WILKINSON	Accepted: calendar item	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014694	FTC- LCAREV-014694	7/21/2010	S. WILKINSON	not supported calendar message.ics	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	Virtual Calendar File	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014695	FTC- LCAREV-014695	7/21/2010	S. WILKINSON	Accepted: calendar item	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV-014696	FTC- LCAREV-014696	7/21/2010	S. WILKINSON	Accepted: calendar item	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege

BEGBATES/ENDBATES	BEGATTACH/ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-014755		7/28/2010	S. WILKINSON	FTY: Tomorrow's calls.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014826		8/8/2010	S. WILKINSON	LabCorp Meeting.htm	Natalie manzo@doj.ca.gov* Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014827		8/9/2010	S. WILKINSON	Re: LabCorp Meeting.htm	Winston Chen* <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014828		8/9/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Winston, Chen@doj.ca.gov* Bovee, Stephanie* C. <SBOVEE@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014829		8/10/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014831		8/10/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014833		8/10/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014847		8/11/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014849		8/11/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014851		8/11/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014864		8/11/2010	S. WILKINSON	RE: FTC investigation of LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014869	FTC-LCAREV-014869	8/13/2010	S. WILKINSON	Re: LabCorp/Westcliff - Subpoena/CID.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014869	FTC-LCAREV-014869	8/16/2010	S. WILKINSON	LabCorp/Westcliff Maps.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Bovee, Stephanie* C. <SBOVEE@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEG/BATES	END/BATES	BEG/ATTACH	END/ATTACH	DATE/SENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-014870	FTC-LCAREV-014869	FTC-LCAREV-014869	FTC-LCAREV-014904		S. WILKINSON	Northern CA Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014871	FTC-LCAREV-014869	FTC-LCAREV-014869	FTC-LCAREV-014904		S. WILKINSON	Southern CA County Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014896	FTC-LCAREV-014896	FTC-LCAREV-014896	FTC-LCAREV-014904		S. WILKINSON	Westcliff CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014897	FTC-LCAREV-014869	FTC-LCAREV-014869	FTC-LCAREV-014904		S. WILKINSON	LabCorp CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014898	FTC-LCAREV-014869	FTC-LCAREV-014869	FTC-LCAREV-014904		S. WILKINSON	LabCorp Southern CA Locations.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014899	FTC-LCAREV-014869	FTC-LCAREV-014869	FTC-LCAREV-014904		S. WILKINSON	Northern CA County Overlaps.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014905	FTC-LCAREV-014905	FTC-LCAREV-014905	FTC-LCAREV-014905	8/16/2010	S. WILKINSON	Re: LabCorp Westcliff Maps.htm	Winston Chen* <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014907	FTC-LCAREV-014907	FTC-LCAREV-014907	FTC-LCAREV-014907	8/17/2010	S. WILKINSON	Re: LabCorp Westcliff Maps.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014919	FTC-LCAREV-014919	FTC-LCAREV-014919	FTC-LCAREV-014919	8/19/2010	S. WILKINSON	Interview with Third Party	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014941	FTC-LCAREV-014941	FTC-LCAREV-014941	FTC-LCAREV-014941	8/23/2010	S. WILKINSON	Meeting with LapCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014950	FTC-LCAREV-014950	FTC-LCAREV-014950	FTC-LCAREV-014950	8/23/2010	S. WILKINSON	RE: Meeting with LapCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-014951	FTC-LCAREV-014951	FTC-LCAREV-014951	FTC-LCAREV-014951	8/23/2010	S. WILKINSON	RE: Meeting with LapCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEG BATES	END BATES	BEG ATTACH	END ATTACH	DATE SENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC- LCAREV- 015030	FTC- LCAREV- 015030			8/24/2010	S. WILKINSON	Re: FW: LabCorp presentation.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov> Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov> Bovee, Stephanie* C. <SBOVEE@ftc.gov> Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015040	FTC- LCAREV- 015040	FTC-LCAREV- 015040	FTC-LCAREV- 015044	8/27/2010	S. WILKINSON	LA and Orange County Maps.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015041	FTC- LCAREV- 015042	FTC-LCAREV- 015040	FTC-LCAREV- 015044		S. WILKINSON	OC Map.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015043	FTC- LCAREV- 015044	FTC-LCAREV- 015040	FTC-LCAREV- 015044		S. WILKINSON	LA Map.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015045	FTC- LCAREV- 015045			8/27/2010	S. WILKINSON	RE: LA and Orange County Maps.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015057	FTC- LCAREV- 015057			9/7/2010	S. WILKINSON	LabCorp Westcliff Investigational Hearings.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015058	FTC- LCAREV- 015059			9/7/2010	S. WILKINSON	Re: LabCorp Westcliff Investigational Hearings.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015060	FTC- LCAREV- 015060			9/8/2010	S. WILKINSON	Fwd: LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015061	FTC- LCAREV- 015061			9/9/2010	S. WILKINSON	RE: LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015062	FTC- LCAREV- 015062			9/9/2010	S. WILKINSON	RE: LabCorp.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Penny Nagler* <Penny.Nagler@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015082	FTC- LCAREV- 015082			9/9/2010	S. WILKINSON	RE: LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov> Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015083	FTC- LCAREV- 015083			9/13/2010	S. WILKINSON	LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015083	FTC-LCAREV- 015083			9/14/2010	S. WILKINSON	San Bernardino and Riverside County Maps.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9345; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(ML.Gx)

BEGBATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-015084	FTC-LCAREV-015088	FTC-LCAREV-015083	FTC-LCAREV-015091		S. WILKINSON	San Bernardino County Map.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015089	FTC-LCAREV-015091	FTC-LCAREV-015083	FTC-LCAREV-015091		S. WILKINSON	Riverside County.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015104	FTC-LCAREV-015104			9/22/2010	S. WILKINSON	LabCorp/Westcliff Transcripts.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com> Penny Nagler* <mnknowling@ftc.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015107	FTC-LCAREV-015107			9/22/2010	S. WILKINSON	Re: LabCorp/Westcliff Transcripts.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015110	FTC-LCAREV-015111			9/23/2010	S. WILKINSON	RE: LabCorp/Westcliff Transcripts.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015112	FTC-LCAREV-015113			9/23/2010	S. WILKINSON	RE: LabCorp/Westcliff Transcripts.htm						
FTC-LCAREV-015123	FTC-LCAREV-015123	FTC-LCAREV-015123	FTC-LCAREV-015144		S. WILKINSON	LabCorp/Westcliff Transcripts.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015124	FTC-LCAREV-015144	FTC-LCAREV-015123	FTC-LCAREV-015144		S. WILKINSON	Westcliff - Final Settlement - 05-13-2010.pdf	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015145	FTC-LCAREV-015146			9/25/2010	S. WILKINSON	Fwd: RE: Purchase of Westcliff Medical Laboratories, Inc. .htm	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	Vincent DiCarlo* <Vincent.DiCarlo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015147	FTC-LCAREV-015147			9/27/2010	S. WILKINSON	RE: LabCorp/Westcliff (Out of Office).htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015148	FTC-LCAREV-015148			9/27/2010	S. WILKINSON	RE: LabCorp/Westcliff.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEGBATES: ENDBATES: EGATTACH: ENDATTACH: DATESSENT: CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC- LCAREV- 015167		Demarchi, Sleigh, Lisa <idemarchisleigh@ftc.gov> Wilkinson, Stephanie A. <SWILKINSON@ftc.gov> Winston Chen*	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015168	LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015169	RE: LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015170		Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015171	RE: LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015172		Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015173	RE: LabCorp.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015174		Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015181	Lab Corp Merger Memo 10-13-10.doc.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015182		Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015186	Lab Corp Merger Memo 10-13-10.doc	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>		N/A	MS Word for Document (OLE)	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015187	RE: Lab Corp Merger Memo 10-13-10.doc	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Wilkinson, Stephanie A. <sparks@ftcexchange.com>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015188		Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 015189	Memorandum on Clinical Laboratory Providers August 2010.htm	Winston Chen* <Winston.Chen@doj.ca.gov> Demarchi Sleigh, Lisa* <idemarchisleigh@ftc.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>		N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

BEGATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-015188	FTC-LCAREV-015191	FTC-LCAREV-015187	FTC-LCAREV-015191		S. WILKINSON	Moratorium Clinical Lab Providers Aug 2010.pdf		Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>		Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015404				10/15/2010	S. WILKINSON	Re: Second CD Instructions.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015778				10/29/2010	S. WILKINSON	Re: Lab Corp/Westcliff Docs.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015805	FTC-LCAREV-015805			11/18/2010	S. WILKINSON	FW: LabCorp Complaint vs. FTC filed today in C.D. Calif. Bankruptcy Court (Westcliff Bkrcy Proceeding).htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015837					S. WILKINSON	LabCorp complaint vs FTC in Westcliff Bankruptcy Proceeding.pdf	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015893				11/18/2010	S. WILKINSON	Re: FW: LabCorp Complaint vs. FTC filed today in C.D. Calif.	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015894				12/7/2010	S. WILKINSON	OC hearing tomorrow.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015895				12/7/2010	S. WILKINSON	Re: OC hearing tomorrow.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-015896				12/9/2010	S. WILKINSON	OC Hearing.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016002				12/13/2010	S. WILKINSON	Re: OC hearing tomorrow.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine



In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9345; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(MLG)

BEGGATES/ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-016625	FTC-LCAREV-016625	FTC-LCAREV-016797	7/15/2010	Network_Data	List of Physicians Groups	Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-016799	FTC-LCAREV-016625	FTC-LCAREV-016797		Network_Data	IPA List.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-016798	FTC-LCAREV-016798	FTC-LCAREV-016799	6/25/2010	Network_Data	Form 712.msg	Golden, William P. <BGOLDEN@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016802	FTC-LCAREV-016799	FTC-LCAREV-016799		Network_Data	Signed FTC Form 712.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016808	FTC-LCAREV-016805	FTC-LCAREV-016811		Network_Data	Lab Corp Merger Memo 10-13-10.doc					MS Word for Windows Document (OLE)	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016812	FTC-LCAREV-016812	FTC-LCAREV-016812	6/9/2010	Network_Data	Moratorium Clinical Lab Providers Aug 2010.pdf	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	Vincent DiCarlo* <Vincent.DCarlo@doj.ca.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Dennis Fenwick <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016813	FTC-LCAREV-016813	FTC-LCAREV-016834	9/24/2010	Network_Data	Purchase of Westcliff Medical Laboratories Inc. 6-9-10.msg	Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-016814	FTC-LCAREV-016813	FTC-LCAREV-016834		Network_Data	Qui Tam Blue Shield Info. 9-24-10.msg					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016835	FTC-LCAREV-016855	FTC-LCAREV-016855		Network_Data	Westcliff - Final Settlement - 05-13-2010.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine

In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9345; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(MLGx)

BEGGATES	ENDBATES	BEGATTACH	ENDATTACH	DATES	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding (Government deliberative process privilege, Attorney work-product doctrine)
FTC-LCAREV-016856	FTC-LCAREV-016857				Network_Data	CA - Westcliff Med. Laboratory.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016858	FTC-LCAREV-016858				Network_Data	Email to Kathleen Foote 6-10-10.msg	kathleen.foote@doj.ca.gov	Wilkinson, Stephanie A. <sparks@ftexchange.com>	Moiseyev, Michael R. <MMOISEYEV@ftc.gov>; Klarfeld, Jonathan <JKLARFELD@ftc.gov>; Long, Randall <RLONG@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016859	FTC-LCAREV-016866			5/10/2010	Network_Data	Email to Vincent DiCarlo 6-9-10.msg					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-016867	FTC-LCAREV-017029				Network_Data	Unsecured Creditors Objection Qui Tam.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-017030	FTC-LCAREV-017122				Network_Data	Asset Purchase Agreement 5-17-10.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-017123	FTC-LCAREV-017149				Network_Data	Interim Order.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-017150	FTC-LCAREV-017222				Network_Data	Motion to Approve Compromise Qui Tam.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-017223	FTC-LCAREV-017229				Network_Data	Order Approving Qui Tam Settlement.pdf					Adobe Portable Document Format	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-017230	FTC-LCAREV-017230				Network_Data	Purchase of Westcliff Medical Laboratories, Inc.htm	Vincent DiCarlo <VincentDiCarlo@doj.ca.gov>	Klarfeld, Jonathan <JKLARFELD@ftc.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Dennis Fenwick <Dennis.Fenwick@doj.ca.gov>; Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>; Moiseyev, Michael R. <MMOISEYEV@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026145	FTC-LCAREV-026145			12/20/2010	S_WILKINSON	Hearing on 12/22.htm	Wilkinson, Stephanie A. <SWILKINSON@ftc.gov>	Winston Chen <Winston.Chen@doj.ca.gov>			HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026146	FTC-LCAREV-026146			12/20/2010	S_WILKINSON	RE: Hearing on 12/22.htm	Winston Chen <Winston.Chen@doj.ca.gov>	Wilkinson, Stephanie A. <sparks@ftexchange.com>	Natalie Manzo <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine

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In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9346; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(MLGx)

BEG/BATES	END/BATES	BEG/ATTACH	END/ATTACH	DATE/SENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC- LCAREV- 026147	FTC- LCAREV- 026148			12/20/2010	S_WILKINSON	RE: Hearing on 12/22.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 026149	FTC- LCAREV- 026150			12/20/2010	S_WILKINSON	RE: Hearing on 12/22.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Penny Nagler* <Penny.Nagler@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 026151	FTC- LCAREV- 026152			12/20/2010	S_WILKINSON	RE: Hearing on 12/22.htm	Penny Nagler* <Penny.Nagler@doj.ca.gov>	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 026162	FTC- LCAREV- 026163			12/20/2010	S_WILKINSON	Re: Hearing on 12/22.htm	Winston.Chen@doj.ca.gov*	Wilkinson, Stephanie* A. <sparks@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC- LCAREV- 026437	FTC- LCAREV- 026437			7/13/2010	J_CARLSON	Response to calendar item regarding interview with third party	Carlson, Julie A. <jdecourycarlson@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov> Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourycarlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>; Meneau, Mitchell <mmeneau@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 026438	FTC- LCAREV- 026438			7/19/2010	J_CARLSON	Call in number for call with Third Party	Winston.Chen@doj.ca.gov* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourycarlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC- LCAREV- 026439	FTC- LCAREV- 026439			7/19/2010	J_CARLSON	Response to call in number for call with third party	Winston.Chen@doj.ca.gov* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Yechshanova, Dilyara <dyechshanova@ftc.gov>; Carlson, Julie A. <jdecourycarlson@ftc.gov>; Southworth, James* <JSOUTHWORTH@ftc.gov>; Knowing, Mackenzie <mknowing@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege

In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9345; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(MLG)

BEGBATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-026698	FTC-LCAREV-026698	FTC-LCAREV-026698	FTC-LCAREV-026698	7/2/2010	J. CARLSON	Accepted: calendar item	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026699	FTC-LCAREV-026699	FTC-LCAREV-026699	FTC-LCAREV-026699		J. CARLSON	not supported calendar message.ics				N/A	Virtual Calendar	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026700	FTC-LCAREV-026700	FTC-LCAREV-026700	FTC-LCAREV-026700	7/6/2010	J. CARLSON	not supported calendar message.ics	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026701	FTC-LCAREV-026701	FTC-LCAREV-026701	FTC-LCAREV-026701		J. CARLSON	not supported calendar message.ics						Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026702	FTC-LCAREV-026702	FTC-LCAREV-026702	FTC-LCAREV-026702	8/13/2010	J. CARLSON	LabCorpWestcliff - Subpoena/CID.htm	Natalie Manzo @doj.ca.gov	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026703	FTC-LCAREV-026703	FTC-LCAREV-026703	FTC-LCAREV-026703		J. CARLSON	LabCorp CID.pdf					Adobe Portable	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026718	FTC-LCAREV-026718	FTC-LCAREV-026718	FTC-LCAREV-026718		J. CARLSON	LabCorp Subpoena.pdf					Adobe Portable	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026734	FTC-LCAREV-026734	FTC-LCAREV-026734	FTC-LCAREV-026734	9/14/2010	J. CARLSON	San Bernardino and Riverside County Maps.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026735	FTC-LCAREV-026735	FTC-LCAREV-026735	FTC-LCAREV-026735		J. CARLSON	San Bernardino County Map.pdf					Adobe Portable	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026740	FTC-LCAREV-026740	FTC-LCAREV-026740	FTC-LCAREV-026740		J. CARLSON	Riverside County.pdf					Adobe Portable	Government deliberative process privilege, Attorney work-product doctrine

BEGBATES	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-026743	FTC-LCAREV-026744	9/14/2010	J. CARLSON	RE: San Bernardino and Riverside County Maps.htm	Winston Chen <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026745	FTC-LCAREV-026746	9/27/2010	J. CARLSON	RE: RE: Purchase of Westcliff Medical Laboratories, Inc. .htm	Vincent DiCarlo <Vincent.DCarlo@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026747	FTC-LCAREV-026748	9/27/2010	J. CARLSON	RE: RE: Purchase of Westcliff Medical Laboratories, Inc. .htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Vincent DiCarlo <Vincent.DCarlo@doj.ca.gov>	Brian Keats <Brian.Keats@doj.ca.gov>; Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine, Government informant privilege
FTC-LCAREV-026750	FTC-LCAREV-026751	10/6/2010	J. CARLSON	LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026751	FTC-LCAREV-026752	10/8/2010	J. CARLSON	Voice message	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Adorno Voice Messaging <adornovm@ftc.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026752	FTC-LCAREV-026753	10/11/2010	J. CARLSON	Voice message	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>; Penny Nagler* <Penny.Nagler@doj.ca.gov>; Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	N/A	MS Windows Wave Sound (Intel)	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026754	FTC-LCAREV-026755	10/11/2010	J. CARLSON	RE: LabCorp.htm	Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	N/A	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026756	FTC-LCAREV-026757	10/13/2010	J. CARLSON	Lab Corp Merger Memo 10-13-10.doc.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026758	FTC-LCAREV-026759	10/13/2010	J. CARLSON	Lab Corp Merger Memo 10-13-10.doc.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	HyperText Markup Language	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026759	FTC-LCAREV-026760	10/13/2010	J. CARLSON	Lab Corp Merger Memo 10-13-10.doc.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>; Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>; Wilkinson, Stephanie* A. <SWILKINSON@ftc.gov>	N/A	MS Word for Word	Government deliberative process privilege, Attorney work-product doctrine

BEGBATES	ENDBATES	BEGATTACH	ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAREV-026763	FTC-LCAREV-026763	FTC-LCAREV-026763	FTC-LCAREV-026767	10/13/2010	J. CARLSON	Moratorium on Clinical Laboratory Providers August 2010.htm	Natalie Manzo <Natalie.manzo@doj.ca.gov>	Sandra Tinson <Sandra.Tinson@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026764	FTC-LCAREV-026763	FTC-LCAREV-026767	FTC-LCAREV-026767		J. CARLSON	Moratorium on Clinical Laboratory Providers August 2010.htm				N/A		Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026768	FTC-LCAREV-026768										Adobe Portable	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026769	FTC-LCAREV-026770			10/14/2010	J. CARLSON	Meeting Re Concordance.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Frank Banueloz <Frank.Banueloz@doj.ca.gov>			Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026771	FTC-LCAREV-026772			10/14/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Frank Banueloz <Frank.Banueloz@doj.ca.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026773	FTC-LCAREV-026774			10/14/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Frank Banueloz <Frank.Banueloz@doj.ca.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026775	FTC-LCAREV-026776			10/14/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Frank Banueloz <Frank.Banueloz@doj.ca.gov>			Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026777	FTC-LCAREV-026779			10/14/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Winston Chen <Winston.Chen@doj.ca.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026780	FTC-LCAREV-026781			10/14/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftcexchange.com>	Frank Banueloz <Frank.Banueloz@doj.ca.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026782	FTC-LCAREV-026784			10/15/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAREV-026785	FTC-LCAREV-026785			10/27/2010	J. CARLSON	RE: Meeting Re Concordance.htm	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	N/A		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine
				10/29/2010	J. CARLSON	Re: LabCorp/Westcliff Docs.htm	Natalie Manzo* <Natalie.manzo@doj.ca.gov>	Winston Chen* <Winston.Chen@doj.ca.gov>	Demarchi Sleigh, Lisa* <demarchisleigh@ftc.gov>		HyperText Mark	Government deliberative process privilege, Attorney work-product doctrine

In the Matter of Laboratory Corporation of America and Laboratory Corporation of America Holdings, Docket No. 9345; Federal Trade Commission v. Laboratory Corporation of America, et al., Case No. SACV10-1873AG(MLGx)

BEGBATES' ENDBATES	BEGATTACH' ENDATTACH	DATESENT	CUSTODIAN	FILE NAME/DESCRIPTION	TO	FROM	CC	BCC	FILETYPE	Basis for Withholding
FTC-LCAE-000642	FTC-LCAE-000642	6/16/2010	J. KLARFELD	VM: (Caller Unknown).msg	Klarfeld, Jonathan* <JKLARFELD@ftc.gov>	Adorno Voice Messaging <adornovm@ftc.gov>	N/A	N/A	MS Outlook Message	Government deliberative process privilege, Attorney work-product doctrine
FTC-LCAE-000643	FTC-LCAE-000643		J. KLARFELD	Voice_Message_Recording_S137825_001_9.sm.wav					MS Windows Wave Sound (title)	Government deliberative process privilege, Attorney work-product doctrine
Pursuant to instruction 4 of both Defendants' First Request for Documents to Plaintiff and Respondents' First request for Documents to Federal Trade Commission, the FTC has denoted each attorney that it could identify with an asterisk.										

## Exhibit E



Plaintiff's Supplemental Privilege Log in Response to Defendants' First Request for Documents to Plaintiff and Respondents' First Request for Documents to Federal Trade Commission			
This privilege log does not contain communications within the Federal Trade Commission. The Federal Trade Commission has not required Hogan Lovells US LLP to produce a privilege log containing internal correspondence during the pendency of this action. Plaintiff reserves the right to supplement this privilege log as necessary.			
Number of Documents	Date Range	CUSTODIANS	DESCRIPTION
158	7/23/2010 - 1/5/2011	S. WILKINSON and/or Network Data	Communications between Emmett Kane and FTC staff regarding hold separate agreement and hold separate entity
6	1/4/2011 - 1/5/2011		Communications between Emmett Kane and counsel and FTC staff regarding hold separate agreement and hold separate entity
151	7/29/2010 - 12/6/2010		Communications between Emmett Kane and Danny Shoemaker and FTC staff regarding hold separate agreement and hold separate entity
10	8/5/2010; 8/19/2010; 10/11/2/2010		Communications between Danny Shoemaker and FTC staff regarding hold separate agreement and hold separate entity