

# THOMPSON COE

Thompson, Coe, Cousins & Irons, L.L.P.  
Attorneys and Counselors

**To:** Bobbie G. Bayless **Fax:** (713) 522-2218  
**Phone:** \_\_\_\_\_

**From:** Cory S. Reed **Phone:** (713) 403-8213

**Date:** January 31, 2014 **Time:** \_\_\_\_\_

**File No:** 00520.415 **User ID:** REEDC

**Re:** Cause No. 2013-05455; Carl Henry Brunsting, et al v. Candace L. Kunz-Freed, et al; In the 164<sup>th</sup> Judicial District Court of Harris County, Texas

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Urgent       For Review       Please Comment       Please Reply

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# THOMPSON COE

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Austin  
Dallas  
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Los Angeles  
Northern California  
Saint Paul

January 31, 2014

**VIA FACSIMILE**

Bobbie G. Bayless  
Bayless & Stokes  
2931 Ferndale  
Houston, Texas 77098

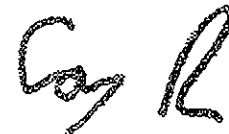
Re: No. 2013-05455; *Carl Henry Brunsting, et al v. Candace L. Kunz-Freed, et al*; In  
the 164<sup>th</sup> Judicial District Court of Harris County, Texas.

Dear Ms. Bayless:

Enclosed, please find the following document which was electronically filed with the  
Court today:

1. Notice of Filing Defendants' Privilege Log.

Sincerely,



Cory S. Reed

/rg  
Enclosure

**CAUSE NO. 2013-05455**

**CARL HENRY BRUNSTING,  
INDEPENDENT EXECUTOR OF THE  
ESTATES OF ELMER H. BRUNSTING  
AND NELVA E. BRUNSTING**

§ **IN THE DISTRICT COURT OF**  
§  
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§  
§  
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§  
§ **HARRIS COUNTY, TEXAS**  
§  
§  
§  
§  
§  
§ **164TH JUDICIAL DISTRICT**

**V.**


**CANDACE L. KUNZ-FREED AND  
VACEK & FREED, PLLC f/k/a  
THE VACEK LAW FIRM, PLLC**

**NOTICE OF FILING DEFENDANTS' PRIVILEGE LOG**

Pursuant to the Texas Rules of Civil Procedure, Defendants Candace L. Kunz-Freed and Vacek & Freed, PLLC f/k/a The Vacek Law Firm, PLLC file the attached Privilege Log.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By:  \_\_\_\_\_  
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**COUNSEL FOR DEFENDANTS  
CANDACE L. KUNZ-FREED AND  
VACEK & FREED, PLLC f/k/a  
THE VACEK LAW FIRM, PLLC**

**CERTIFICATE OF SERVICE**

I certify that I served a true and correct copy of the foregoing instrument in accordance with the *TEXAS RULES OF CIVIL PROCEDURE* on the 31st day of January 2014 to the following counsel of record:

Bobbie G. Bayless  
Bayless & Stokes  
2931 Ferndale  
Houston, Texas 77098



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Cory S. Reed

DEFENDANTS' PRIVILEGE LOG

Case No.	Date	Author	Recipient	Document	Subject	Privilege
V&F 002054 - V&F 002057	1/27/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002058 - V&F 002060	7/27/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002061 - V&F 002066	12/08/11	Candace L. Kuntz-Freed	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002067 - V&F 002070	12/23/10	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002071 - V&F 002072	3/29/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product

Invoice No.	Date	Sender	Recipient	Document	Subject	Privilege
V&F 002073 - V&F 002075	9/20/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002076	11/29/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002077 - V&F 002078	12/28/11	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002079	1/12/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 0020890	1/31/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product

Bates No.	Date	Applicant	Recipient	Document	Summary	Policy
V&F 002081	2/14/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002082 - V&F 002085	2/14/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002086 - V&F 002089	3/20/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002090 - V&F 002093	3/29/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002094	4/12/12	Vacek & Freed, PLLC	Anita Kay Brunsting and Amy Ruth Brunsting	Statement	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product

Entry No.	Date	Author	Recipient	Document	Subject	Privilege
V&F 002095 - V&F 002096	1/24/11	Anita Brunsting	Candace L. Kunz-Freed	Email	Email string between attorney and client regarding stock valuation.	Attorney-Client Communication
V&F 002097	1/27/11	Summer Peoples	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002098	7/27/11	Summer Peoples	Anita Kay Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002099	8/16/11	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002100	12/8/11	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding representation.	Attorney-Client Communication
V&F 002101 - V&F 002102	12/20/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding life insurance proceeds.	Attorney-Client Communication
V&F 002103 - V&F 002104	12/20/11	Candace L. Kuntz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding life insurance proceeds.	Attorney-Client Communication



Batch No	Date	Author	Recipient	Document	Subject	Event
V&F 002105 - V&F 002106	12/28/11	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002107	1/03/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Communication between attorney and client regarding title of the Buick.	Attorney-Client Communication
V&F 002108	1/05/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding Trust Information Sheets.	Attorney-Client Communication
V&F 002109 - V&F 002112	1/09/12	Candace L. Kunz-Freed	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Email string between attorney and client regarding distribution of trust funds.	Attorney-Client Communication
V&F 002113 - V&F 002114	1/22/12	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding notice to beneficiaries.	Attorney-Client Communication
V&F 002115 - V&F 002116	1/23/12	Candace L. Kunz-Freed	Anita Kay Brunsting	Email	Email string between attorney and client regarding notice to beneficiaries.	Attorney-Client Communication

Date No.	Date	Author	Recipient	Format	Subject	Privilege
V&F 002117 - V&F 002118	1/23/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust accounting.	Attorney-Client Communication
V&F 002119 - V&F 002121	1/24/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust documents.	Attorney-Client Communication
V&F 002122 - V&F 002123	1/24/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding trust accounting.	Attorney-Client Communication
V&F 002124 - V&F 002125	1/31/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Email string between attorney and client regarding Farmland LLC.	Attorney-Client Communication
V&F 002126 - V&F 002127	1/31/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product
V&F 002128	2/14/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication  Attorney Work Product

File No.	Date	Author	Recipient	Document	Subject	Privilege
V&F 002129	2/15/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Correspondence	Attorney communications to client regarding estate planning documents.	Attorney-Client Communication
V&F 002130 - V&F 002132	2/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Summer Peoples	Email	Attorney communications to client regarding promissory note.	Attorney-Client Communication Attorney Work Product
V&F 002133 - V&F 002139	3/02/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Bernard Mathews	Email	Attorney communications to client regarding trust value report.	Attorney-Client Communication Attorney Work Product
V&F 002140 - V&F 002142	3/06/12	Amy Ruth Brunsting	Candace L. Kunz-Freed	Email	Communication between attorney and client regarding promissory note.	Attorney-Client Communication Attorney Work Product
V&F 002143 - V&F 002148	3/14/12	Anita Kay Brunsting	Candace L. Kunz-Freed and Amy Ruth Brunsting	Email	Communication between attorney and client regarding promissory note.	Attorney-Client Communication Attorney Work Product

Bates No.	Date	Author	Recipient	Document	Subject	Privilege
V&F 002149	3/20/12	Summer Peoples	Amy Ruth Brunsting, Anita Kay Brunsting, and Chip Mathews	Email	Attorney communications to client regarding request for wills.	Attorney-Client Communication
V&F 002150 - V&F 002151	3/20/13	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002152	3/22/12	Anita Kay Brunsting	Candace L. Kunz-Freed, Chip Mathews, and Amy Ruth Brunsting	Email	Attorney communications to client regarding December of 2011 accounting.	Attorney-Client Communication
V&F 002153	3/22/12	Anita Kay Brunsting	Candace L. Kunz-Freed	Email	Attorney communications to client regarding accounting.	Attorney-Client Communication
V&F 002154 - V&F 002155	3/27/12	Anita Kay Brunsting	Chip Mathews, Amy Brunsting, Candace L. Kunz-Freed	Email	Email string between attorney and client regarding accounting.	Attorney-Client Communication
V&F 002156 - V&F 002158	3/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Brunsting, and Chip Mathews	Email	Email string between attorney and client regarding asset lists.	Attorney-Client Communication

Case No.	Date	Author	Recipient	Document	Subject	Product
V&F 002159	3/28/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Brunsting, and Bernard Mathews	Email	Attorney communications to client regarding asset lists.	Attorney-Client Communication
V&F 002160 - V&F 002161	3/29/12	Anita Kay Brunsting	Candace L. Kunz-Freed	Email	Email string between attorney and client regarding assets and expenses.	Attorney-Client Communication Attorney Work Product
V&F 002162 - V&F 002163	3/29/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product
V&F 002164 - V&F 002166	3/30/12	Candace L. Kunz-Freed	Anita Kay Brunsting, Amy Ruth Brunsting, and Bernard Mathews	Email	Email string between attorney and client regarding asset list.	Attorney-Client Communication
V&F 002167	4/12/12	Summer Peoples	Anita Kay Brunsting and Amy Ruth Brunsting	Email	Attorney communications to client regarding attorneys' fees.	Attorney-Client Communication Attorney Work Product

Bates No.	Date	Author	Recipient	Document	Subject	Product
V&F 002168 - V&F 002183		Candace L. Kunz-Freed		Chart	Attorney notes/history of representation	Attorney-Client Communication  Attorney Work Product
V&F 002184 - V&F 002191	11/22/11			Document	Authorization for Release of Protected Health Information	Attorney Work Product
V&F 002192	11/22/11			Document	Authorization for Release of Information	Attorney Work Product