

- IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Dated: June 11, 2012

Respectfully submitted,

/s/ R. Michael Leonard

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Attorneys for Defendant R.J. Reynolds Tobacco
Company, individually and as successor by merger
to Brown & Williamson Tobacco Corporation

**R.J. REYNOLDS TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

DOC ID NUMBER : 50062 1806 -1811
DOC DATE : 06/22/1983
AUTHOR (S) : TI
ADDRESSEE (S) : COMM OF COUNSEL
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;CI
DESCRIPTION : REPORT CONCERNING LEGISLATIVE AND REGULATORY MATTERS
PREPARED BY TI EMPLOYEE PROVIDING CONFIDENTIAL
INFORMATION TO COMMITTEE OF COUNSEL MEMBERS SHARING A
COMMON LEGAL INTEREST, TO ASSIST COUNSEL WITH THE
RENDERING OF LEGAL ADVICE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
REMOVAL PROCEDURES WERE NOT FOLLOWED. RECORDS INDICATE
THAT THE DOCUMENT WAS PLACED IN THE SECURED ROOM IN THE
DEPOSITORY PRIOR TO MARCH 30, 1999. RJRT IS SEARCHING
FOR FURTHER RECORDS TO CONFIRM.

DOC ID NUMBER : 50381 0915 -0915
DOC DATE : 10/11/1972
AUTHOR (S) : ROEMER HC
ADDRESSEE (S) : GASTMAN MI; LORILLARD
COPYEE (S) : AUSTERN HT; KORNEGAY HR; STEVENS AJ; CROHN MH JR
PRIVILEGE : AC;CI
DESCRIPTION : CORRESPONDENCE CONCERNING A REGULATORY MATTER PREPARED
BY RJR IN-HOUSE LEGAL COUNSEL RENDERING LEGAL ADVICE
TO LORILLARD IN-HOUSE LEGAL COUNSEL AND COPIED TO
OUTSIDE LEGAL COUNSEL AND IN-HOUSE LEGAL COUNSEL TO
TOBACCO COMPANIES, AND A TI MANAGERIAL EMPLOYEE, ALL
SHARING A COMMON LEGAL INTEREST.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
REMOVAL PROCEDURES WERE NOT FOLLOWED. RECORDS INDICATE
THAT THE DOCUMENT WAS PLACED IN THE SECURED ROOM IN THE
DEPOSITORY PRIOR TO MARCH 30, 1999. RJRT IS SEARCHING
FOR FURTHER RECORDS TO CONFIRM.

DOC ID NUMBER : 50411 7680 -7680
DOC DATE : 00/00/1966
AUTHOR (S) : LS INC
ADDRESSEE (S) : *** NONE ***
COPYEE (S) : *** NONE ***
PRIVILEGE : WP;JD
DESCRIPTION : ABSTRACT OF SCIENTIFIC LITERATURE PREPARED BY LS INC,
OR ITS PREDECESSORS TO ASSIST INDUSTRY ATTORNEYS IN
EVALUATING SCIENTIFIC RESEARCH IN CONNECTION WITH
ONGOING LITIGATION DEFENSE EFFORTS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

DOC ID NUMBER : 51563 4901 -4901
DOC DATE : 07/28/1994
AUTHOR (S) : USREY MA
ADDRESSEE (S) : ROSS B
COPYEE (S) : JOHE SD

**R.J. REYNOLDS TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

PRIVILEGE : AC
DESCRIPTION : REDACTED MATERIAL - (P.4901) HANDWRITTEN NOTE FROM SD
JOHE (RJR IN-HOUSE LEGAL COUNSEL) RENDERING LEGAL
ADVICE TO MA URSEY (RJR EMPLOYEE) REGARDING A DRAFT
RESPONSE TO A CONSUMER COMPLAINT LETTER.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
REMOVAL PROCEDURES WERE NOT FOLLOWED. RECORDS INDICATE
THAT THE DOCUMENT WAS PLACED IN THE SECURED ROOM PRIOR
TO MARCH 30, 1999. RJRT IS SEARCHING FOR FURTHER
RECORDS TO CONFIRM. FURTHER, A DUPLICATE OF THE
REDACTED VERSION OF THIS DOCUMENT IS IN BOX RJR-4487
AND IS AVAILABLE TO THE PUBLIC IN THE DEPOSITORY.

DOC ID NUMBER : 51563 4909 -4909
DOC DATE : 07/07/1994
AUTHOR(S) : USREY MA
ADDRESSEE(S) : LESTER ES
COPYEE(S) : JOHE SD
PRIVILEGE : AC
DESCRIPTION : REDACTED MATERIAL - (P.4909) HANDWRITTEN NOTE FROM SD
JOHE (RJR IN-HOUSE LEGAL COUNSEL) RENDERING LEGAL
ADVICE TO MA URSEY (RJR EMPLOYEE) REGARDING A RESPONSE
TO A CONSUMER COMPLAINT LETTER.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
REMOVAL PROCEDURES WERE NOT FOLLOWED. RECORDS INDICATE
THAT THE DOCUMENT WAS PLACED IN THE SECURED ROOM PRIOR
TO MARCH 30, 1999. RJRT IS SEARCHING FOR FURTHER
RECORDS TO CONFIRM. FURTHER, A DUPLICATE OF THE
REDACTED VERSION OF THIS DOCUMENT IS IN BOX RJR-4487
AND IS AVAILABLE TO THE PUBLIC IN THE DEPOSITORY.

DOC ID NUMBER : 52071 5749 -5754
DOC DATE : 03/29/1997 04/05/1997
AUTHOR(S) : HAAS,FP
ADDRESSEE(S) : HURWITZ E; ARNOLD PORTER
COPYEE(S) : CHILES DEFENSE COUNSEL
PRIVILEGE : AC;WP;JD
DESCRIPTION : REPORT FROM JOINT DEFENSE COUNSEL CONTAINING THOUGHTS
AND OPINIONS OF LIGGETT IN-HOUSE LEGAL COUNSEL
REGARDING IMPRESSIONS OF INDUSTRY COUNSEL AT A MEETING
TO DISCUSS SURGEON GENERAL'S REPORTS, SMOKING AND
HEALTH LITIGATION AND FTC HEARINGS, SENT TO TOBACCO
INDUSTRY IN-HOUSE AND OUTSIDE LEGAL COUNSEL SHARING A
COMMON LEGAL INTEREST.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
REMOVAL PROCEDURES WERE NOT FOLLOWED. RJRT IS SEARCHING
FOR FURTHER RECORDS TO CONFIRM.

DOC ID NUMBER : UNNUMBERED
DOC DATE : 06/13/2000
AUTHOR(S) : WOMBLE CARLYLE
ADDRESSEE(S) : *** NONE ***

**R.J. REYNOLDS TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

COPYEE (S) : *** NONE ***
PRIVILEGE : WP
DESCRIPTION : THIS IS NOT A BATES NUMBERED COPY OF A DOCUMENT
GENERATED BY RJRT AND PRODUCED IN LITIGATION. IT IS A
LAWFIRM GENERATED LIST THAT REFLECTS BATES NUMBERS;
COMPUTER RECORD ACCESSION NUMBERS; PRIVILEGE CODES;
CONFIDENTIALITY LEVELS; AND NUMBER OF PAGES FOR
PARTICULAR DOCUMENTS CONTAINED IN A BOX SHIPPED TO THE
MINNESOTA DEPOSITORY.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

DOC ID NUMBER : UNNUMBERED
DOC DATE : 06/13/2000
AUTHOR (S) : WOMBLE CARLYLE
ADDRESSEE (S) : *** NONE ***
COPYEE (S) : *** NONE ***
PRIVILEGE : WP
DESCRIPTION : THIS IS NOT A BATES NUMBERED COPY OF A DOCUMENT
GENERATED BY RJRT AND PRODUCED IN LITIGATION. IT IS A
LAWFIRM GENERATED LIST THAT REFLECTS BATES NUMBERS;
COMPUTER RECORD ACCESSION NUMBERS; PRIVILEGE CODES;
CONFIDENTIALITY LEVELS; AND NUMBER OF PAGES FOR
PARTICULAR DOCUMENTS CONTAINED IN A BOX SHIPPED TO THE
MINNESOTA DEPOSITORY.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

**CORRESPONDING GLOSSARY FOR
R.J. REYNOLDS TOBACCO COMPANY
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
DATED JUNE 11, 2012**

ARNOLD PORTER	LAW FIRM (ARNOLD & PORTER; ARNOLD, FORTAS & PORTER) (REPRESENTED PHILIP MORRIS) (REPRESENTED TOBACCO COMPANIES)
AUSTERN HT	ATTORNEY (COVINGTON BURLING)
CHILES DEFENSE COUNSEL	TOBACCO COMPANY OUTSIDE LEGAL COUNSEL
COMM OF COUNSEL	TOBACCO INSTITUTE COMMITTEE OF IN-HOUSE AND OUTSIDE ATTORNEYS TO TOBACCO COMPANIES
COVINGTON BURLING	LAW FIRM (COVINGTON & BURLING) (REPRESENTED TI GENERALLY) (REPRESENTED BROWN WILLIAMSON, LIGGETT, PHILIP MORRIS AND RJR IN VARIOUS MATTERS)
CROHN MH JR	RJR IN-HOUSE ATTORNEY; ATTORNEY (JACOB MEDINGER)
GASTMAN MI	LORILLARD IN-HOUSE ATTORNEY
HAAS FP	LIGGETT IN-HOUSE ATTORNEY
HURWITZ E	ATTORNEY (ARNOLD PORTER)
JACOB MEDINGER	LAW FIRM (JACOB & MEDINGER; JACOB, MEDINGER & FINNEGAN) (REPRESENTED RJR)
KORNEGAY HR	TI EMPLOYEE
LIGGETT	LIGGETT & MYERS TOBACCO COMPANY; LIGGETT GROUP INC.
LORILLARD	LORILLARD TOBACCO CO., A DIVISION OF LOEWS THEATRES
LS INC	LITERATURE RETRIEVAL SYSTEM CREATED FOR AND USED BY ATTORNEYS
ROEMER HC	RJR IN-HOUSE ATTORNEY
STEVENS AJ	LORILLARD IN-HOUSE ATTORNEY
TI	THE TOBACCO INSTITUTE, INC.

**KEY FOR PRIVILEGE AND PROTECTION CODES CORRESPONDING GLOSSARY FOR
R.J. REYNOLDS TOBACCO COMPANY PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
DATED JUNE 11, 2012**

Documents found in the following categories reflect legal advice or requests for legal advice or services; provide information in connection with the rendering of legal advice or services; or constitute work product prepared by or for legal counsel:

- AC Confidential communications including documents reflecting confidential communications between client and counsel, between counsel, or between client representatives.
- WP Reports, statements, correspondence, memoranda or other documents prepared in anticipation of litigation or for trial and/or documents which contain the mental impressions, conclusions, opinions or legal theories or factual analyses of an attorney or other representative or employee of a party concerning litigation, or otherwise related to the provision of legal advice or legal services.
- JD Confidential communications between the employees of or counsel for entities engaged in a joint defense effort who have a common legal interest.
- CI Confidential communications between client, counsel, and entities and their counsel reasonably necessary for accomplishment of the purpose for which counsel was consulted.

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

BEGIN BATES : 191060066
 END BATES : 191060067
 DOC DATE : 08/03/1998
 AUTHOR (S) : WACHTELL LIPTON
 ADDRESSEE (S) : MCGRAW-MJ; MELLEN-NE
 COPYEE (S) : SCHOENBACHLER-CL; FLAHERTY-M
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL SUMMARY PREPARED IN CONNECTION WITH
 LITIGATION BY OUTSIDE COUNSEL FOR PHILIP MORRIS, WITH
 WHOM B&W MAINTAINS A COMMON LEGAL INTEREST, AND SENT
 TO B&W IN-HOUSE COUNSEL AND OUTSIDE COUNSEL AND TO
 COUNSEL FOR R.J. REYNOLDS AND LORILLARD, WITH WHOM B&W
 MAINTAINS A COMMON LEGAL INTEREST, CONTAINING
 COUNSEL'S LEGAL ADVICE AND OPINIONS REGARDING
 NON-PARTICIPATING MANUFACTURERS AND THE PROPOSED
 SETTLEMENT OF THE STATE ATTORNEYS GENERAL ACTIONS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 210280507
 END BATES : 210280507
 DOC DATE : 11/19/1998
 AUTHOR (S) : KOPLOW-MG; WACHTELL LIPTON; MELLEN-NE
 ADDRESSEE (S) : MELLEN-NE; BRING-MH; PHILIP MORRIS; WALL-CR; PHILIP
 MORRIS; BARRINGTON-MJ; PHILIP MORRIS; HIRSCH-B; LOEWS;
 MILSTEIN-RS; LORILLARD; ROSOFF-WL; RJR; GOLDEN-AF;
 DAVIS POLK; DUGGAN-CS; DAVIS POLK; PATTON-SR; KIRKLAND
 ELLIS; BLIXT-CA; RJR
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL PORTION OF DRAFT AGREEMENT PREPARED BY
 OUTSIDE COUNSEL FOR PHILIP MORRIS AND LORILLARD, WITH
 WHOM B&W MAINTAINS A COMMON LEGAL INTEREST, AND SENT
 TO B&W IN-HOUSE AND OUTSIDE COUNSEL FOR VARIOUS OTHER
 CIGARETTE MANUFACTURERS, WITH WHOM B&W MAINTAINS A
 COMMON LEGAL INTEREST, PROVIDING LEGAL ADVICE,
 ANALYSIS AND OPINIONS REGARDING DRAFT PROVISIONS OF
 PROPOSED SETTLEMENT AGREEMENT CONCERNING VARIOUS STATE
 ATTORNEYS GENERAL ACTIONS AND CONTAINING CONFIDENTIAL
 HANDWRITTEN NOTATIONS OF B&W IN-HOUSE COUNSEL
 REFLECTING COUNSEL'S LEGAL ADVICE AND OPINIONS
 REGARDING SAME.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 210281054
 END BATES : 210281057
 DOC DATE : 10/23/1998
 AUTHOR (S) : FLAHERTY-M
 ADDRESSEE (S) : MCGRAW-MJ; MELLEN-NE; SCHOENBACHLER-CL; PATTON-SR;
 KIRKLAND ELLIS
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W MANAGEMENT TO B&W

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

IN-HOUSE COUNSEL AND B&W MANAGEMENT PREPARED IN CONNECTION WITH LITIGATION AT THE REQUEST OF COUNSEL AND REFLECTING CONFIDENTIAL COMMUNICATIONS REGARDING PROPOSED SETTLEMENT ISSUES WITH B&W IN-HOUSE COUNSEL (MCGRAW, MJ AND MELLEN, NE) AND CONTAINING INFORMATION AND ANALYSIS TO FACILITATE THE RENDITION OF LEGAL ADVICE REGARDING THE PROPOSED MASTER SETTLEMENT AGREEMENT CONCERNING THE STATE ATTORNEYS GENERAL ACTIONS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 210430230
END BATES : 210430231
DOC DATE : 04/06/1998
AUTHOR (S) : PICKETT-J
ADDRESSEE (S) : DIPASCA-R; GREY ADVERTISING
COPYEE (S) : SMITH-S; GELSON-E; STEVENS-R
PRIVILEGE : AC;CI
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W MANAGEMENT TO B&W OUTSIDE ADVERTISING AGENCY, COPIED TO B&W MANAGEMENT PROVIDING LEGAL ADVICE OF B&W IN-HOUSE COUNSEL (C. SHERMAN) REGARDING PROPOSED KOOL PROMOTIONAL CAMPAIGN.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 283100556
END BATES : 283100562
DOC DATE : 11/16/1998
AUTHOR (S) : MELLEN-NE
ADDRESSEE (S) : *** NONE ***
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH LITIGATION WITH THE STATES ATTORNEYS GENERAL BY B&W IN-HOUSE COUNSEL PROVIDING COUNSEL'S LEGAL ADVICE AND ANALYSIS REGARDING PROVISIONS OF THE PROPOSED MASTER SETTLEMENT AGREEMENT.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 304010485
END BATES : 304010487
DOC DATE : 11/00/1998
AUTHOR (S) : MELLEN-NE
ADDRESSEE (S) : FLAHERTY-M
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

LITIGATION FROM B&W IN-HOUSE COUNSEL TO B&W MANAGEMENT AND PROVIDING COUNSEL'S REQUESTED LEGAL ADVICE, ANALYSIS AND OPINIONS REGARDING PROPOSED PROVISIONS OF THE PROPOSED MASTER SETTLEMENT AGREEMENT CONCERNING THE STATE ATTORNEYS GENERAL COUNSEL ACTIONS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	311101278
END BATES	:	311101296
DOC DATE	:	03/00/1999
AUTHOR (S)	:	HAVIRA-R; ROLFE-R; CRAVATH SWAINE
ADDRESSEE (S)	:	FREEDMAN-BH
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH ANTITRUST LITIGATION FROM B&W OUTSIDE COUNSEL AND B&W MANAGER TO B&W IN-HOUSE COUNSEL PROVIDING LEGAL ADVICE AND INFORMATION TO FACILITATE THE RENDITION OF LEGAL ADVICE IN CONNECTION WITH A DECLARATION TO BE FILED IN PENDING ANTITRUST LITIGATION. (REDACTIONS APPEAR ON 311101283, 311101284, 311101287 AND 311101293-295.)

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	521002747
END BATES	:	521002747
DOC DATE	:	06/06/1983
AUTHOR (S)	:	KANE-DH; KANE DALSIMER
ADDRESSEE (S)	:	PEPPLES-EC
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION PREPARED BY B&W OUTSIDE COUNSEL FOR B&W IN-HOUSE COUNSEL PROVIDING LEGAL ADVICE AND ATTORNEY OPINION WORK PRODUCT REGARDING A PATENT APPLICATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	521040672
END BATES	:	521040687
DOC DATE	:	04/07/1977
AUTHOR (S)	:	PEPPLES-EC
ADDRESSEE (S)	:	MCCARTY-CI
COPYEE (S)	:	PITTMAN-RA
PRIVILEGE	:	AC;WP;JD
DESCRIPTION	:	CONFIDENTIAL DRAFT PRESENTATION PREPARED BY B&W COUNSEL FOR PRESENTATION TO SENIOR MANAGEMENT OF AFFILIATED COMPANIES, SETTING FORTH GENERAL COUNSEL'S THOUGHTS AND OPINIONS, AND REFLECTING GENERAL COUNSEL'S LEGAL ADVICE, REGARDING LEGAL AND REGULATORY

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

DEVELOPMENTS AFFECTING THE U.S. TOBACCO INDUSTRY, AS
WELL AS THE SHIMP LITIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 521040688
END BATES : 521040703
DOC DATE : 04/07/1977
AUTHOR(S) : PEPPLES-EC
ADDRESSEE(S) : MCCARTY-CI
COPYEE(S) : PITTMAN-RA
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL DRAFT PRESENTATION PREPARED BY B&W
COUNSEL FOR PRESENTATION TO SENIOR MANAGEMENT OF
AFFILIATED COMPANIES, SETTING FORTH GENERAL COUNSEL'S
THOUGHTS AND OPINIONS, AND REFLECTING GENERAL
COUNSEL'S LEGAL ADVICE, REGARDING LEGAL AND REGULATORY
DEVELOPMENTS AFFECTING THE U.S. TOBACCO INDUSTRY, AS
WELL AS THE SHIMP LITIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 536461113
END BATES : 536461119
DOC DATE : 08/18/1993
AUTHOR(S) : JONES-WM; WYATT TARRANT
ADDRESSEE(S) : BURKE-FA
COPYEE(S) : WELLS-JK-III
PRIVILEGE : AC
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W OUTSIDE COUNSEL TO
B&W IN-HOUSE COUNSEL REFLECTING COUNSEL'S THOUGHTS AND
IMPRESSIONS REGARDING DOCUMENT RETENTION POLICIES.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 564000238
END BATES : 564000242
DOC DATE : 07/26/1988
AUTHOR(S) : SACHS-RH
ADDRESSEE(S) : B&W LAW DEPT
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL FILE MEMORANDUM PREPARED BY B&W IN-HOUSE
COUNSEL IN CONNECTION WITH PENDING LITIGATION
PROVIDING LEGAL ADVICE AND SETTING FORTH COUNSEL'S
THOUGHTS, MENTAL IMPRESSIONS, AND LEGAL OPINIONS
REGARDING THE STATUS OF VARIOUS LAWSUITS PENDING
AGAINST B&W AND OTHER CIGARETTE MANUFACTURERS,
INCLUDING ISSUES RELATING TO DISCOVERY AND TRIAL
STRATEGY. THE CASES REFERENCED INCLUDE
ASBESTOS/SYNERGY ACTIONS, INCLUDING THE BROWN, GREEN,

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

HURLEY AND JONES CASES.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	590020439
END BATES	:	590020445
DOC DATE	:	11/16/1998
AUTHOR (S)	:	MELLEN-NE
ADDRESSEE (S)	:	*** NONE ***
COPYEE (S)	:	DOYLE-PH; GELSON-E; DENNISON-SL; GOINS-B
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION PREPARED BY B&W IN-HOUSE COUNSEL AND COPIED TO B&W EMPLOYEES PROVIDING COUNSEL'S LEGAL ADVICE AND ANALYSIS REGARDING PROVISIONS OF THE PROPOSED MASTER SETTLEMENT AGREEMENT, IN CONNECTION WITH LITIGATION WITH THE STATES ATTORNEYS GENERAL.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	599103824
END BATES	:	599103832
DOC DATE	:	12/06/1995
AUTHOR (S)	:	LIN-OC
ADDRESSEE (S)	:	APPLETON-BS
COPYEE (S)	:	B&W LAW DEPT
PRIVILEGE	:	AC;WP
DESCRIPTION	:	TRANSMITTAL AND DRAFT OF DATA REGARDING SMOKE CONSTITUENTS PERTAINING TO BARCLAY AND KOOL CIGARETTES PREPARED BY B&W EMPLOYEE, TRANSMITTED TO B&W MANAGERIAL EMPLOYEE AND COPIED TO B&W LEGAL COUNSEL, PROVIDING CONFIDENTIAL INFORMATION TO FACILITATE THE RENDERING OF LEGAL ADVICE REGARDING B&W'S RESPONSE TO FDA ASSERTION OF JURISDICTION OVER TOBACCO PRODUCTS IN CONNECTION WITH ADVERSARIAL PROCEEDINGS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	599103833
END BATES	:	599103837
DOC DATE	:	12/04/1995
AUTHOR (S)	:	LIN-OC
ADDRESSEE (S)	:	APPLETON-BS; BERRYMAN-CF
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION PREPARED AT THE REQUEST OF COUNSEL FROM B&W SCIENTIST TO B&W SCIENTIST CONVEYING WORK PRODUCT TO BE PROVIDED TO COUNSEL TO FACILITATE THE RENDITION OF LEGAL ADVICE IN CONNECTION WITH DRAFT RESPONSE TO PROPOSED FDA REGULATIONS CONCERNING TOBACCO PRODUCTS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

BEGIN BATES : 620222376
 END BATES : 620222396
 DOC DATE : 04/15/1988
 AUTHOR (S) : OLGES-TA
 ADDRESSEE (S) : MCGRAW-MJ; PEPPLES-EC; SACHS-RH
 COPYEE (S) : MCDONOUGH-JA
 PRIVILEGE : AC
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W MANAGEMENT TO B&W
 IN-HOUSE COUNSEL PROVIDING INFORMATION AND REQUESTING
 LEGAL ADVICE REGARDING A VARIETY OF LEGAL ISSUES AND
 CONCERNS, INCLUDING PRODUCT LIABILITY/LAWSUITS,
 SAMPLING BAN/RESTRICTIONS, ADVERTISING
 BAN/RESTRICTIONS, AND PRODUCT REGULATION, FACING THE
 TOBACCO INDUSTRY TO FACILITATE THE RENDITION OF LEGAL
 ADVICE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 660019092
 END BATES : 660019092
 DOC DATE : 05/02/1977
 AUTHOR (S) : FREEDMAN-BH
 ADDRESSEE (S) : WILLETS-EA
 COPYEE (S) : MCKEOWN-FE
 PRIVILEGE : AC
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
 TO B&W MANAGEMENT PROVIDING COUNSEL'S LEGAL ADVICE AND
 ANALYSIS REQUESTED BY B&W MANAGEMENT REGARDING
 PROPOSED KOOL PROMOTIONS AND LOCAL REGULATIONS
 AFFECTING SAME.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 672132044
 END BATES : 672132050
 DOC DATE : 11/16/1998
 AUTHOR (S) : MELLEN-NE
 ADDRESSEE (S) : *** NONE ***
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED BY B&W IN-HOUSE
 COUNSEL PROVIDING COUNSEL'S LEGAL ADVICE AND ANALYSIS
 REGARDING PROVISIONS OF THE PROPOSED MASTER SETTLEMENT
 AGREEMENT, IN CONNECTION WITH LITIGATION WITH THE
 STATES ATTORNEYS GENERAL.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

BEGIN BATES : 680084089
END BATES : 680084090
DOC DATE : 09/27/1976
AUTHOR (S) : SACHS-RH
ADDRESSEE (S) : BROACH-VC
COPYEE (S) : *** NONE ***
PRIVILEGE : AC
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
TO B&W MANAGEMENT, REFLECTING COUNSEL'S LEGAL ADVICE
REGARDING ADVERTISING.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680098160
END BATES : 680098164
DOC DATE : 00/00/1976
AUTHOR (S) : DOWNING-L
ADDRESSEE (S) : *** NONE ***
COPYEE (S) : B&W LAW DEPT
PRIVILEGE : AC
DESCRIPTION : CONFIDENTIAL PORTION OF REPORT PREPARED BY B&W
MANAGEMENT, REFLECTING LEGAL ADVICE OF B&W IN-HOUSE
COUNSEL (PEPPLES, EC) REGARDING REGULATORY OVERSIGHT OF
TOBACCO INDUSTRY ISSUES. (REDACTION APPEARS ON
680098160.)

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680416905
END BATES : 680416990
DOC DATE : 10/01/1981
AUTHOR (S) : COVINGTON BURLING
ADDRESSEE (S) : PEPPLES-EC
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL DRAFT COMMENTS PREPARED IN ANTICIPATION
OF ADVERSARIAL PROCEEDINGS PREPARED BY OUTSIDE COUNSEL
FOR THE TOBACCO INSTITUTE, WITH WHOM B&W MAINTAINS A
COMMON LEGAL INTEREST, AND SENT TO B&W IN-HOUSE
COUNSEL REFLECTING COUNSEL'S LEGAL ADVICE AND ANALYSIS
REGARDING PROPOSED RESPONSE TO FTC STAFF REPORT ON THE
CIGARETTE ADVERTISING INVESTIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680522321
END BATES : 680522330
DOC DATE : 01/00/1977

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

AUTHOR (S) : ABRAMS-J; MARKET FACTS
ADDRESSEE (S) : SACHS-RH
COPYEE (S) : *** NONE ***
PRIVILEGE : WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED BY B&W CONSULTANT
AT THE REQUEST OF B&W IN-HOUSE COUNSEL TO FACILITATE
LEGAL ADVICE IN CONNECTION WITH BROWN & WILLIAMSON'S
DEFENSE IN VARIOUS PROCEEDINGS.
REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680522331
END BATES : 680522340
DOC DATE : 01/00/1977
AUTHOR (S) : ABRAMS-J; MARKET FACTS
ADDRESSEE (S) : SACHS-RH
COPYEE (S) : *** NONE ***
PRIVILEGE : WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED BY B&W CONSULTANT
AT THE REQUEST OF B&W IN-HOUSE COUNSEL TO FACILITATE
LEGAL ADVICE IN CONNECTION WITH BROWN & WILLIAMSON'S
DEFENSE IN VARIOUS PROCEEDINGS.
REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680522424
END BATES : 680522425
DOC DATE : 08/31/1976
AUTHOR (S) : PEPPIES-EC
ADDRESSEE (S) : ABRAMS-J; MARKET FACTS
COPYEE (S) : PITTMAN-RA
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
TO MANAGEMENT AT MARKET RESEARCH COMPANY REQUESTING
SERVICES AND INFORMATION TO FACILITATE THE RENDITION
OF LEGAL ADVICE IN CONNECTION WITH BROWN & WILLIAMSON'S
DEFENSE IN VARIOUS RELATED PROCEEDINGS INCLUDING
MATTERS AT ISSUE WITH THE FEDERAL TRADE COMMISSION.
REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680522426
END BATES : 680522426
DOC DATE : 08/31/1976
AUTHOR (S) : PEPPIES-EC
ADDRESSEE (S) : ABRAMS-J; MARKET FACTS
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL DRAFT LETTER PREPARED BY B&W IN-HOUSE

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

COUNSEL REQUESTING INFORMATION AND SERVICES FROM
MARKET RESEARCH COMPANY FOR USE IN CONNECTION WITH
B&W'S DEFENSE IN VARIOUS REGULATORY PROCEEDINGS WITH
RESPECT TO CIGARETTE ADVERTISING INCLUDING MATTERS AT
ISSUE WITH THE FEDERAL TRADE COMMISSION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	680522427
END BATES	:	680522428
DOC DATE	:	08/31/1976
AUTHOR (S)	:	PEPPLES-EC
ADDRESSEE (S)	:	ABRAMS-J; MARKET FACTS
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL DRAFT LETTER PREPARED BY B&W IN-HOUSE COUNSEL REQUESTING INFORMATION AND SERVICES FROM MARKET RESEARCH COMPANY FOR USE IN CONNECTION WITH B&W'S DEFENSE IN VARIOUS REGULATORY PROCEEDINGS MATTERS AT ISSUE WITH THE FEDERAL TRADE COMMISSION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	680561759
END BATES	:	680561762
DOC DATE	:	08/14/1972
AUTHOR (S)	:	MUIJE-CS
ADDRESSEE (S)	:	YEAMAN-AY
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION FROM B&W MANAGEMENT TO B&W IN-HOUSE COUNSEL PROVIDING INFORMATION TO FACILITATE THE RENDITION OF LEGAL ADVICE IN CONNECTION WITH MARKETING.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	680592105
END BATES	:	680592110
DOC DATE	:	03/03/1983
AUTHOR (S)	:	WELLS-JK-III
ADDRESSEE (S)	:	B&W LAW DEPT
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP;JD
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION AUTHORED BY B&W IN-HOUSE COUNSEL AND PROVIDED TO AFFILIATED COMPANIES, WITH WHOM B&W MAINTAINS A COMMON LEGAL INTEREST, PROVIDING LEGAL ADVICE CONCERNING LITIGATION. THIS DRAFT ALSO CONTAINS COUNSEL'S HANDWRITTEN NOTES CONCERNING

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

POTENTIAL IMPACT OF LITIGATION, INCLUDING
TOBACCO-ASBESTOS LITIGATION.
REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 680596367
END BATES : 680596367
DOC DATE : 01/26/1982
AUTHOR(S) : LAMB-CG
ADDRESSEE(S) : HASKELL-B; PARIS HASKELL
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
TO B&W OUTSIDE COUNSEL REQUESTING LEGAL ADVICE
REGARDING B&WS RESPONSE TO AN ACTION BY THE PATENT
OFFICE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 680703970
END BATES : 680703973
DOC DATE : 09/11/1991
AUTHOR(S) : JACOB-EJ; JACOB MEDINGER
ADDRESSEE(S) : WELLS-JK-III
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED IN ANTICIPATION OF
LITIGATION BY OUTSIDE COUNSEL FOR R.J. REYNOLDS, WITH
WHOM B&W MAINTAINS A COMMON LEGAL INTEREST, AND
FORWARDED TO B&W IN-HOUSE COUNSEL, REFLECTING LEGAL
ADVICE AND COUNSEL'S THOUGHTS AND IMPRESSIONS
REGARDING LITIGATION STRATEGY.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 680900215
END BATES : 680900217
DOC DATE : 01/22/1993
AUTHOR(S) : WELLS-JK-III
ADDRESSEE(S) : MCGRAW-MJ
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH
LITIGATION FROM B&W IN-HOUSE COUNSEL TO B&W SENIOR
VICE PRESIDENT LAW, PURSUANT TO THE LATTER'S REQUEST,
PROVIDING INFORMATION CONCERNING THE B&W LAW
DEPARTMENT'S MONTHLY ACTIVITIES AND REVEALING
COUNSEL'S THOUGHTS AND OPINIONS CONSTITUTING ATTORNEY
OPINION WORK PRODUCT REGARDING ONGOING DEVELOPMENTS
AND STRATEGIES TO BE UNDERTAKEN IN NUMEROUS TOBACCO
PRODUCT LIABILITY AND OTHER LAWSUITS PENDING AGAINST
THE TOBACCO INDUSTRY, INCLUDING THE KUEPER, BUTLER,
AND JASON CASES.

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 681300109
END BATES : 681300109
DOC DATE : 11/14/1994
AUTHOR (S) : KOVATCH-MS
ADDRESSEE (S) : FREEDMAN-BH
COPYEE (S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH
FTC PROCEEDINGS RELATING TO ACQUISITION OF AMERICAN
TOBACCO, SENT FROM B&W MANAGER TO B&W IN-HOUSE COUNSEL
PROVIDING COUNSEL WITH INFORMATION TO FACILITATE THE
RENDITION OF LEGAL ADVICE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 682017105
END BATES : 682017106
DOC DATE : 05/19/1988
AUTHOR (S) : WELLS-JK-III
ADDRESSEE (S) : SACHS-RH
COPYEE (S) : SCHECHTER-DA; MYLES-JD
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL COMMUNICATION CONSTITUTING ATTORNEY
OPINION WORK PRODUCT FROM B&W IN-HOUSE LEGAL COUNSEL
TO B&W IN-HOUSE LEGAL COUNSEL, SETTING FORTH DEFENSE
TRIAL STRATEGY IN THE GIRTON CASE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 682054764
END BATES : 682054765
DOC DATE : 06/10/1975
AUTHOR (S) : PEPPLES-EC
ADDRESSEE (S) : MORINI-HA
COPYEE (S) : BRYANT-HD; BATEMAN-RA; CUMMINS-BD; ARDREY-RL-JR
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL TO
IN-HOUSE COUNSEL FOR BAT, WITH WHOM B&W MAINTAINS A
COMMON LEGAL INTEREST, REGARDING ANTITRUST MATTERS
INVOLVING PURCHASES OF WOMEN'S CLOTHING WITH CREDIT
CARDS ISSUED BY DEPARTMENT STORES IN NEW YORK CITY,
COPIED TO B&W MANAGEMENT, COUNSEL AND A CONSULTANT.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 682055727
END BATES : 682055727

BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012

DOC DATE : 11/30/1978
 AUTHOR (S) : DUERR-RE
 ADDRESSEE (S) : PELLEGRINI-R
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
 TO B&W MANAGEMENT PROVIDING LEGAL ADVICE REGARDING
 MARKETING.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 682234102
 END BATES : 682234102
 DOC DATE : 04/02/1964
 AUTHOR (S) : DAVIES-TE
 ADDRESSEE (S) : RAVLIN-JN
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;CI
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE LEGAL
 COUNSEL, WITH WHOM B&W SHARES A COMMON LEGAL INTEREST,
 TO B&W IN-HOUSE LEGAL COUNSEL THAT REFLECTS A REQUEST
 FOR LEGAL ADVICE REGARDING A CONTRACT.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 682338043
 END BATES : 682338043
 DOC DATE : 08/06/1954
 AUTHOR (S) : BRYANT-HD
 ADDRESSEE (S) : JAMES-M; JAMES FRANKLIN
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
 TO B&W OUTSIDE COUNSEL REQUESTING LEGAL ADVICE
 REGARDING A PATENT.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 682438414
 END BATES : 682438414
 DOC DATE : 11/27/1991
 AUTHOR (S) : MYLES-JD
 ADDRESSEE (S) : WELLS-JK-III
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL
 TO B&W IN-HOUSE LEGAL COUNSEL SETTING FORTH COUNSEL'S
 THOUGHTS AND MENTAL IMPRESSIONS REGARDING THE FERIOZZI
 LITIGATION, AND CONTAINING AN ASSESSMENT OF

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

PLAINTIFFS' CLAIMS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	682811284
END BATES	:	682811387
DOC DATE	:	01/28/1992
AUTHOR (S)	:	PURVIS-AR; SHOOK HARDY
ADDRESSEE (S)	:	*** NONE ***
COPYEE (S)	:	WELLS-JK-III
PRIVILEGE	:	AC;WP;JD
DESCRIPTION	:	REDACTED MATERIAL - (PP.1284-1299) CONFIDENTIAL COMMUNICATION PREPARED IN CONNECTION WITH DEPOSITION TESTIMONY IN THE HAINES CASE BY OUTSIDE LEGAL COUNSEL FOR THE TOBACCO INDUSTRY WITH WHOM B&W MAINTAINS A COMMON LEGAL INTEREST, AND FORWARDED TO B&W IN-HOUSE LEGAL COUNSEL, PROVIDING COUNSEL'S LEGAL ADVICE, ANALYSIS AND MENTAL IMPRESSIONS REGARDING ARTICLES RELATED TO CIGARETTE ADVERTISING.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	685005319
END BATES	:	685005319
DOC DATE	:	10/02/1980
AUTHOR (S)	:	WELLS-JK-III
ADDRESSEE (S)	:	NORTHRIP-RE; SHOOK HARDY
COPYEE (S)	:	NORTHRIP-RE
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION CONSTITUTING ATTORNEY OPINION WORK PRODUCT FROM B&W IN-HOUSE COUNSEL TO B&W OUTSIDE COUNSEL REQUESTING LEGAL ADVICE REGARDING STATEMENTS TO THE PRESS MADE BY COUNSEL FOR AN ADVERSE PARTY IN LOS ANGELES AND SAN FRANCISCO ASBESTOS- TOBACCO LITIGATION. (REDACTION APPEARS ON PAGE 685005319.)

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	686013482
END BATES	:	686013482
DOC DATE	:	05/02/1977
AUTHOR (S)	:	FREEDMAN-BH
ADDRESSEE (S)	:	WILLETS-EA
COPYEE (S)	:	MCKEOWN-FE
PRIVILEGE	:	AC
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION FROM B&W IN-HOUSE COUNSEL TO B&W MANAGEMENT PROVIDING COUNSEL'S LEGAL ADVICE REQUESTED BY B&W MANAGEMENT REGARDING PROPOSED KOOL PROMOTION AND NEBRASKA TRADE REGULATIONS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES	:	689409467
END BATES	:	689409467
DOC DATE	:	05/10/1983
AUTHOR (S)	:	HARDY-DK; SHOOK HARDY; PEPPLES-EC
ADDRESSEE (S)	:	WELLS-JK-III
COPYEE (S)	:	PEPPLES-EC
PRIVILEGE	:	AC;WP;JD
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION FROM OUTSIDE INDUSTRY COUNSEL TO B&W IN-HOUSE COUNSEL, PROVIDING LEGAL ADVICE REGARDING STRATEGIC ISSUES RELATED TO DEFENDING ASBESTOS-TOBACCO LAWSUITS. THE LETTER ALSO CONTAINS A CONFIDENTIAL HANDWRITTEN NOTE OF B&W IN-HOUSE LEGAL COUNSEL REFLECTING COUNSEL'S THOUGHTS AND OPINIONS REGARDING THIS ISSUE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	689409468
END BATES	:	689409469
DOC DATE	:	05/03/1983
AUTHOR (S)	:	HARDY-DK; SHOOK HARDY; PEPPLES-EC
ADDRESSEE (S)	:	WELLS-JK-III; PEPPLES-EC
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP;JD
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION FROM OUTSIDE INDUSTRY COUNSEL TO B&W IN-HOUSE COUNSEL, PROVIDING LEGAL ADVICE REGARDING STRATEGIC ISSUES RELATED TO DEFENDING ASBESTOS-TOBACCO LAWSUITS. THE LETTER ALSO CONTAINS A CONFIDENTIAL HANDWRITTEN NOTE OF B&W IN-HOUSE LEGAL COUNSEL REFLECTING COUNSEL'S THOUGHTS AND OPINIONS REGARDING THIS ISSUE.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES	:	690143163
END BATES	:	690143179
DOC DATE	:	03/03/1983
AUTHOR (S)	:	WELLS-JK-III
ADDRESSEE (S)	:	HUGHES-IW
COPYEE (S)	:	*** NONE ***
PRIVILEGE	:	AC;WP
DESCRIPTION	:	CONFIDENTIAL COMMUNICATION PREPARED BY B&W IN-HOUSE COUNSEL AND SENT TO B&W MANAGEMENT CONTAINING COUNSEL'S LEGAL ANALYSIS, ADVICE AND OPINIONS REGARDING VARIOUS ISSUES INCLUDING PROPOSED TOBACCO-RELATED LEGISLATION, PENDING AND ANTICIPATED SMOKING AND HEALTH LITIGATION, LITIGATION INVOLVING FIRE-SAFE CIGARETTES AND PUBLIC SMOKING, ASBESTOS-TOBACCO CLAIMS, AND ADVERTISING AND TAX ISSUES.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION

**BROWN & WILLIAMSON PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 774087406
 END BATES : 774087414
 DOC DATE : 11/06/1978
 AUTHOR (S) : KULLY-E
 ADDRESSEE (S) : SACHS-RH
 COPYEE (S) : DENNY-J; JOHNSTON-D; LEWIS-R; MACKENZIE-S; MCKEOWN-F;
 PARRACK-E; PITTMAN-RA; TIGHE-P
 PRIVILEGE : AC
 DESCRIPTION : REDACTED MATERIAL-(PP.7406-7407) CONFIDENTIAL
 COMMUNICATION FROM B&W MANAGEMENT TO B&W IN-HOUSE
 COUNSEL MEMORIALIZING PRIOR LEGAL ADVICE AND PROVIDING
 INFORMATION TO FACILITATE THE RENDITION OF LEGAL
 ADVICE REGARDING PROPOSED MARKET RESEARCH STUDY.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 784015602
 END BATES : 784015631
 DOC DATE : 08/17/1977
 AUTHOR (S) : FREEDMAN-BH
 ADDRESSEE (S) : *** NONE ***
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC
 DESCRIPTION : CONFIDENTIAL HANDWRITTEN NOTES OF B&W IN-HOUSE COUNSEL
 CONTAINING COUNSEL'S LEGAL ADVICE CONCERNING PROPOSED
 KOOL ADVERTISEMENTS. (REDACTIONS APPEAR ON 784015630
 AND 784015631.)

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

BEGIN BATES : 785039112
 END BATES : 785039120
 DOC DATE : 05/31/1974
 AUTHOR (S) : HENDERSON-B; WELLS-JK-III
 ADDRESSEE (S) : PEPPLES-EC; HENDERSON-B
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC
 DESCRIPTION : REDACTED MATERIAL - (P. 785039114) CONFIDENTIAL
 COMMUNICATION FROM B&W IN-HOUSE COUNSEL TO B&W
 MARKETING DEPARTMENT MANAGER PROVIDING COUNSEL'S LEGAL
 ADVICE AT THE REQUEST OF B&W MANAGER REGARDING LANGUAGE
 USED IN PROPOSED KOOL MAGAZINE ADVERTISEMENTS.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: COUNSEL KNOWS OF NO REASON TO BELIEVE THAT
 PROCEDURES FOR SEALING WERE NOT FOLLOWED. RJRT IS
 SEARCHING FOR FURTHER RECORDS TO CONFIRM.

**KEY FOR PRIVILEGE AND PROTECTION CODES CORRESPONDING GLOSSARY FOR
BROWN & WILLIAMSON PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
DATED JUNE 11, 2012**

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- AC Confidential communications including documents reflecting confidential communications between client and counsel, between counsel, or between client representatives.
- WP Reports, statements, correspondence, memoranda or other documents prepared in anticipation of litigation or for trial and/or documents which contain the mental impressions, conclusions, opinions or legal theories or factual analyses of an attorney or other representative or employee of a party concerning litigation, or otherwise related to the provision of legal advice or legal services.
- JD Confidential communications between the employees of or counsel for entities engaged in a joint defense effort who have a common legal interest.
- CI Confidential communications between client, counsel, and entities and their counsel reasonably necessary for accomplishment of the purpose for which counsel was consulted.

**CORRESPONDING GLOSSARY FOR BROWN & WILLIAMSON
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

ABRAMS-J	MARKET FACTS EMPLOYEE
APPLETON-BS	B&W EMPLOYEE
ARDREY-RL-JR	MORGAN GUARANTY EMPLOYEE
B&W	BROWN & WILLIAMSON
B&W LAW DEPT	BROWN & WILLIAMSON LEGAL DEPARTMENT
BARRINGTON-MJ	PHILIP MORRIS IN-HOUSE ATTORNEY
BAT	BRITISH AMERICAN TOBACCO
BATEMAN-RA	B&W EMPLOYEE
BERRYMAN-CF	LEGAL ASSISTANT (KING SPALDING)
BLIXT-CA	RJR IN-HOUSE ATTORNEY
BRING-MH	ATTORNEY (ARNOLD PORTER); PM IN-HOUSE ATTORNEY
BROACH-VC	B&W EMPLOYEE
BROWN TODD	LAW FIRM (BROWN TODD & HEYBURN) (REPRESENTED B&W)
BRYANT-HD	B&W IN-HOUSE ATTORNEY
BURKE-FA	B&W IN-HOUSE ATTORNEY
COVINGTON BURLING	LAW FIRM (COVINGTON & BURLING) (REPRESENTED TI GENERALLY) (REPRESENTED B&W, LIGGETT, PHILIP MORRIS AND RJR IN VARIOUS MATTERS)
CUMMINS-BD	B&W EMPLOYEE; TI EMPLOYEE
DAVIES-TE	B&W IN-HOUSE ATTORNEY
DAVIS POLK	LAW FIRM (DAVIS POLK WARDWELL SUNDERLAND & KIENDL; DAVIS POLK & WARDWELL) (REPRESENTED RJR)

**CORRESPONDING GLOSSARY FOR BROWN & WILLIAMSON
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

DENNISON-SL	B&W EMPLOYEE
DIPASCA-R	GREY ADVERTISING EMPLOYEE
DOYLE-PH	B&W EMPLOYEE
DUERR-RE	B&W IN-HOUSE ATTORNEY
DUGGAN-CS	ATTORNEY (DAVIS POLK)
FLAHERTY-M	B&W EMPLOYEE
FREEDMAN-BH	B&W IN-HOUSE ATTORNEY
GELSON-E	B&W EMPLOYEE
GOINS-B	B&W EMPLOYEE
GOLDEN-AF	ATTORNEY (DAVIS POLK)
GREY ADVERTISING	B&W ADVERTISING CONSULTANT
HARDY-DK	ATTORNEY (SHOOK HARDY)
HASKELL-B	ATTORNEY (PARIS HASKELL)
HIRSCH-B	LOEWS IN-HOUSE ATTORNEY
HUGHES-IW	B&W EMPLOYEE
JACOB MEDINGER	LAW FIRM (JACOB & MEDINGER; JACOB MEDINGER & FINNEGAN) (REPRESENTED RJR) (REPRESENTED CTR)
JACOB-EJ	ATTORNEY (DAVIS POLK; CABELL MEDINGER; MEDINGER FORSYTH; LAUTERSTEIN LAUTERSTEIN; JACOB MEDINGER)
JAMES FRANKLIN	LAW FIRM (JAMES & FRANKLIN) (REPRESENTED B&W)

**CORRESPONDING GLOSSARY FOR BROWN & WILLIAMSON
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

JAMES-M	ATTORNEY (JAMES FRANKLIN)
JONES-WM	ATTORNEY (WYATT TARRANT)
KANE DALSIMER	LAW FIRM (KANE DALSIMER KANE SULLIVAN & KURUCZ) (REPRESENTED B&W)
KANE-DH	ATTORNEY (KANE DALSIMER)
KIRKLAND ELLIS	LAW FIRM (KIRKLAND & ELLIS) (REPRESENTED B&W)
KOPLOW-MG	ATTORNEY (WACHTELL LIPTON)
KOVATCH-MS	B&W EMPLOYEE
LAMB-CG	ATTORNEY (MIDDLETON REUTLINGER);B&W IN-HOUSE ATTORNEY
LIN-OC	B&W EMPLOYEE
LOEWS	LOEWS CORP;LOEWS THEATER
LORILLARD	LORILLARD TOBACCO CO., A DIVISION OF LOEWS THEATRES
MARKET FACTS	MARKETING CONSULTANT RETAINED BY B&W
MCCARTY-CI	B&W EMPLOYEE
MCDONOUGH-JA	B&W EMPLOYEE
MCGRAW-MJ	B&W IN-HOUSE ATTORNEY
MCKEOWN-FE	B&W EMPLOYEE
MELLEN-NE	B&W IN-HOUSE ATTORNEY
MILSTEIN-RS	LORILLARD IN-HOUSE ATTORNEY
MORGAN GUARANTY	B&W FINANCIAL CONSULTANT (MORGAN GUARANTY TRUST OF NY)

**CORRESPONDING GLOSSARY FOR BROWN & WILLIAMSON
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

MORINI-HA	B&W IN-HOUSE ATTORNEY
MUIJE-CS	B&W EMPLOYEE
MYLES-JD	B&W IN-HOUSE ATTORNEY
OLGES-TA	B&W EMPLOYEE
PARIS HASKELL	LAW FIRM (PARIS & HASKELL) (REPRESENTED B&W)
PATTON-SR	ATTORNEY (KIRKLAND ELLIS)
PEPPLES-EC	B&W IN-HOUSE ATTORNEY
PHILIP MORRIS "PM"	PHILIP MORRIS USA, INC.
PICKETT-J	B&W EMPLOYEE
PITTMAN-RA	B&W EMPLOYEE
RAVLIN-JN	B&W IN-HOUSE ATTORNEY
RJR	RJ REYNOLDS TOBACCO COMPANY; RJ REYNOLDS INDUSTRIES, INC., RJR NABISCO, INC., RJ REYNOLDS INTERNATIONAL INC; RELATED SUBSIDIARIES
ROSOFF-WL	RJR IN-HOUSE ATTORNEY
SACHS-RH	B&W IN-HOUSE ATTORNEY
SCHECHTER-DA	B&W IN-HOUSE ATTORNEY
SCHOENBACHLER-CL	B&W EMPLOYEE
SHOOK HARDY	LAW FIRM (SHOOK HARDY & BACON) (REPRESENTED B&W) (REPRESENTED PM & LORILLARD)
STEVENS-R	B&W EMPLOYEE
WACHTELL LIPTON	LAW FIRM (WACHTELL LIPTON ROSEN & KATZ)

**CORRESPONDING GLOSSARY FOR BROWN & WILLIAMSON
PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

(REPRESENTED PHILIP MORRIS AND LORILLARD)

WALL-CR

ATTORNEY (SHOOK HARDY)

WELLS-JK-III

B&W IN-HOUSE ATTORNEY

WILLETS-EA

B&W EMPLOYEE

WYATT TARRANT

LAW FIRM (WYATT TARRANT & COMBS) (REPRESENTED B&W)

YEAMAN-AY

B&W IN-HOUSE ATTORNEY

AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012

BEGIN BATES : 946003586
 END BATES : 946003604
 DOC DATE : 11/01/1969
 AUTHOR(S) : OSHEA-SF; 3I
 ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : WP;JD
 DESCRIPTION : CONFIDENTIAL BULLETIN PREPARED IN ANTICIPATION OF
 LITIGATION AND LEGISLATIVE PROCEEDINGS BY INDUSTRY
 LITIGATION SUPPORT SYSTEM PERSONNEL REGARDING SELECTED
 SMOKING AND HEALTH ARTICLES TO PROVIDE INFORMATION
 NECESSARY TO LEGAL COUNSEL TO FACILITATE THE PROVISION
 OF LEGAL ADVICE.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 946003920
 END BATES : 946003939
 DOC DATE : 01/15/1969
 AUTHOR(S) : OSHEA-SF; 3I
 ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : WP;JD
 DESCRIPTION : CONFIDENTIAL BULLETIN PREPARED IN ANTICIPATION OF
 LITIGATION AND LEGISLATIVE PROCEEDINGS BY INDUSTRY
 LITIGATION SUPPORT SYSTEM PERSONNEL REGARDING SELECTED
 SMOKING AND HEALTH ARTICLES TO PROVIDE INFORMATION
 NECESSARY TO LEGAL COUNSEL TO FACILITATE THE PROVISION
 OF LEGAL ADVICE.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 950376374
 END BATES : 950376380
 DOC DATE : 03/17/1959
 AUTHOR(S) : HANMER-HR
 ADDRESSEE(S) : MOORE-JA
 COPYEE(S) : *** NONE ***
 PRIVILEGE : WP
 DESCRIPTION : CONFIDENTIAL COMMUNICATION FROM AN AMERICAN EMPLOYEE
 PROVIDING INFORMATION TO A NON-TESTIFYING EXPERT
 REGARDING EXPERT WITNESSES IN CONNECTION WITH
 LITIGATION.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 968177867
 END BATES : 968177885
 DOC DATE : 09/00/1977
 AUTHOR(S) : HENSON-A
 ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : REDACTED MATERIAL - (P. 7870) CONFIDENTIAL HANDWRITTEN
 NOTATIONS OF AMERICAN GENERAL COUNSEL REFLECTING

AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012

COUNSEL'S THOUGHTS AND OPINIONS REGARDING CRITIQUE OF
FISHBEIN STUDY IN CONNECTION WITH ONGOING AND PENDING
PROCEEDINGS BEFORE THE FTC.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980053654
END BATES : 980053658
ALIAS : LD-90001-229-00290/00294
DOC DATE : 11/17/1978
AUTHOR(S) : SMYTHE-HB; BUIST MOORE
ADDRESSEE(S) : HENSON-A
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP
DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED BY AMERICAN OUTSIDE
COUNSEL AND FORWARDED TO AMERICAN IN-HOUSE COUNSEL
PROVIDING LEGAL ADVICE AND ANALYSIS REGARDING
ASBESTOS-RELATED ILLNESSES, PREPARED IN CONNECTION
WITH GROOMS LITIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980060361
END BATES : 980060400
DOC DATE : 01/22/1968
AUTHOR(S) : HENKE-MJ; COVINGTON BURLING
ADDRESSEE(S) : *** NONE ***
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED BY TI OUTSIDE COUNSEL
CONTAINING TI OUTSIDE COUNSEL'S OPINIONS AND ANALYSIS
OF THE RESULTS OF THE PUBLIC HEALTH SERVICE SURVEY OF
1964.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980060401
END BATES : 980060440
DOC DATE : 01/22/1968
AUTHOR(S) : HENKE-MJ; COVINGTON BURLING
ADDRESSEE(S) : *** NONE ***
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED BY TI OUTSIDE COUNSEL
CONTAINING TI OUTSIDE COUNSEL'S OPINIONS AND ANALYSIS
OF THE RESULTS OF THE PUBLIC HEALTH SERVICE SURVEY OF
1964.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980136868
END BATES : 980136868
DOC DATE : 11/24/1981
AUTHOR(S) : COVINGTON BURLING

**AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : PORTION OF A CONFIDENTIAL REPORT PREPARED BY TI
 OUTSIDE COUNSEL CONTAINING TI OUTSIDE COUNSEL'S
 ANALYSIS, THOUGHTS AND IMPRESSIONS REGARDING THE FTC
 STAFF REPORT ON THE CIGARETTE ADVERTISING
 INVESTIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980136879
 END BATES : 980136966
 DOC DATE : 11/24/1981
 AUTHOR(S) : COVINGTON BURLING
 ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL REPORT PREPARED BY TI OUTSIDE COUNSEL
 CONTAINING TI OUTSIDE COUNSEL'S ANALYSIS, THOUGHTS AND
 IMPRESSIONS REGARDING THE FTC STAFF REPORT ON THE
 CIGARETTE ADVERTISING INVESTIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980137841
 END BATES : 980137841
 DOC DATE : 09/18/1981
 AUTHOR(S) : TEMKO-SL; COVINGTON BURLING
 ADDRESSEE(S) : COMMITTEE OF COUNSEL
 COPYEE(S) : *** NONE ***
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL MEMORANDUM FROM TI OUTSIDE COUNSEL TO
 INDUSTRY COUNSEL CONTAINING TI OUTSIDE COUNSEL'S
 OPINIONS, ADVICE, AND ANALYSIS REGARDING DRAFT
 RESPONSE TO FTC STAFF REPORT ON CIGARETTE ADVERTISING
 INVESTIGATION.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980137933
 END BATES : 980138023
 DOC DATE : 09/18/1981
 AUTHOR(S) : COVINGTON BURLING
 ADDRESSEE(S) : *** NONE ***
 COPYEE(S) : *** NONE ***
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL DRAFT MEMORANDUM PREPARED BY TI OUTSIDE
 COUNSEL CONTAINING TI OUTSIDE COUNSEL'S COMMENTS AND
 ANALYSIS REGARDING FTC STAFF REPORT ON THE CIGARETTE
 ADVERTISING INVESTIGATION DISTRIBUTED TO INDUSTRY
 COUNSEL.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

**AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

BEGIN BATES : 980154706
 END BATES : 980154714
 DOC DATE : 11/19/1991
 AUTHOR (S) : OECHLER-HJ-JR; CHADBOURNE PARKE
 ADDRESSEE (S) : KLEMMANN-GL-II
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP
 DESCRIPTION : CONFIDENTIAL MEMORANDUM FROM AMERICAN OUTSIDE LEGAL
 COUNSEL TO AMERICAN IN-HOUSE LEGAL COUNSEL PROVIDING
 COUNSEL'S SUMMARY AND REFLECTING COUNSEL'S MENTAL
 IMPRESSIONS OF A TOBACCO HEARING.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980171695
 END BATES : 980171700
 DOC DATE : 10/00/1990
 AUTHOR (S) : TI
 ADDRESSEE (S) : *** NONE ***
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;CI
 DESCRIPTION : CONFIDENTIAL DRAFT PRESS RELEASE PREPARED BY TI
 OUTSIDE COUNSEL AND CONTAINING AMERICAN OUTSIDE
 COUNSEL'S HANDWRITTEN NOTATIONS REFLECTING ADVICE OF
 COUNSEL REGARDING INDUSTRY ADVERTISING EFFORTS
 LAUNCHED TO DISCOURAGE YOUTH SMOKING.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980171701
 END BATES : 980171706
 DOC DATE : 10/00/1990
 AUTHOR (S) : COVINGTON BURLING
 ADDRESSEE (S) : *** NONE ***
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;CI
 DESCRIPTION : CONFIDENTIAL DRAFT PRESS RELEASE PREPARED BY TI
 OUTSIDE COUNSEL AND CONTAINING AMERICAN OUTSIDE
 COUNSEL'S HANDWRITTEN NOTATIONS REFLECTING ADVICE OF
 COUNSEL REGARDING INDUSTRY ADVERTISING EFFORTS
 LAUNCHED TO DISCOURAGE YOUTH SMOKING.
 REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
 PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980199224
 END BATES : 980199262
 DOC DATE : 01/22/1968
 AUTHOR (S) : HENKE-MJ; COVINGTON BURLING
 ADDRESSEE (S) : *** NONE ***
 COPYEE (S) : *** NONE ***
 PRIVILEGE : AC;WP;JD
 DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED BY TI OUTSIDE COUNSEL
 CONTAINING TI OUTSIDE COUNSEL'S OPINIONS AND ANALYSIS
 OF THE RESULTS OF THE PUBLIC HEALTH SERVICE SURVEY OF

AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012

1964.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980199263
END BATES : 980199301
DOC DATE : 01/22/1968
AUTHOR(S) : HENKE-MJ; COVINGTON BURLING
ADDRESSEE(S) : *** NONE ***
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;WP;JD
DESCRIPTION : CONFIDENTIAL MEMORANDUM PREPARED BY TI OUTSIDE COUNSEL
CONTAINING COUNSEL'S OPINIONS, ADVICE AND ANALYSIS
REGARDING THE PUBLIC HEALTH SERVICE SURVEY OF 1964.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

BEGIN BATES : 980244816
END BATES : 980244872
DOC DATE : 07/21/1967
AUTHOR(S) : INDUSTRY COUNSEL
ADDRESSEE(S) : HETSKO-CF
COPYEE(S) : *** NONE ***
PRIVILEGE : AC;JD
DESCRIPTION : CONFIDENTIAL DRAFT REPORT PREPARED BY INDUSTRY COUNSEL
CONTAINING INDUSTRY COUNSEL'S ANALYSIS REGARDING
RESPONSE FTC REPORT TO CONGRESS RELATING TO CIGARETTE
LABELING AND ADVERTISING ACT.

REASON FOR SEALING IN SECURED ROOM: INADVERTENT PRODUCTION
PROCEDURES FOR SEALING FOLLOWED: YES

**CORRESPONDING GLOSSARY FOR
AMERICAN TOBACCO COMPANY PRIVILEGE INDEX
PURSUANT TO ORDER #30-REMAND
JUNE 11, 2012**

3I	INDUSTRY LITIGATION SUPPORT SYSTEM
AMERICAN "ATCO"	THE AMERICAN TOBACCO COMPANY; AMERICAN BRANDS, INC
BUIST MOORE	LAW FIRM (BUIST MOORE SMYTHE & MCGEE) (REPRESENTED AMERICAN)
CHADBOURNE PARKE	LAW FIRM (CHADBOURNE & PARKE) (REPRESENTED AMERICAN AND B&W)
COMMITTEE OF COUNSEL	TI COMMITTEE CONSISTING OF GENERAL COUNSEL OF THE TOBACCO INDUSTRY
COVINGTON BURLING	LAW FIRM (COVINGTON & BURLING) (REPRESENTED TI GENERALLY) (REPRESENTED B&W, LIGGETT, PHILIP MORRIS AND RJR IN VARIOUS MATTERS)
HANMER-HR	AMERICAN EMPLOYEE
HENKE-MJ	ATTORNEY (COVINGTON BURLING)
HENSON-A	ATTORNEY (CHADBOURNE PARKE); AMERICAN IN-HOUSE ATTORNEY
HETSKO-CF	ATTORNEY (CHADBOURNE PARKE); AMERICAN IN-HOUSE ATTORNEY
INDUSTRY COUNSEL	IN-HOUSE AND OUTSIDE LEGAL COUNSEL TO TOBACCO COMPANIES SHARING A COMMON LEGAL INTEREST
KLEMMANN-GL-II	AMERICAN IN-HOUSE ATTORNEY
MOORE-JA	AMERICAN LITIGATION CONSULTANT
OECHLER-HJ-JR	ATTORNEY (CHADBOURNE PARKE)
OSHEA-SF	LRD EMPLOYEE; 3I EMPLOYEE
SMYTHE-HB	LEGAL ASSISTANT (JACOB MEDINGER)
TEMKO-SL	ATTORNEY (COVINGTON BURLING)
TI	THE TOBACCO INSTITUTE, INC.

**KEY FOR PRIVILEGE AND PROTECTION CODES CORRESPONDING GLOSSARY FOR
AMERICAN TOBACCO COMPANY PRIVILEGE INDEX PURSUANT TO ORDER #30-REMAND
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- JD Confidential communications between the employees of or counsel for entities engaged in a joint defense effort who have a common legal interest.
- CI Confidential communications between client, counsel, and entities and their counsel reasonably necessary for accomplishment of the purpose for which counsel was consulted.