

JOINT DEFENSE PRIVILEGE LOG FOR LIGGETT JOINT
DEFENSE/COMMON INTEREST PRIVILEGED DOCUMENTS
CATEGORIES 1, 3, 4B, 5 AND 7

LIG NUMBERS:

MINN NUMBERS: LG 0303238/3239

TYPE: LT

DATE: 6/10/81

AUTHOR: Crohn M.H.

RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 9, 34, 37

PRIVILEGE: WP; AC; JD

DESCRIPTION: Correspondence from RJR in-house counsel Crohn
to Committee of Counsel concerning a Committee
of Counsel meeting which reflects legal
counsel's recommendations regarding important
subjects for discussion among and consideration
by Committee of Counsel related to smoking and
health within a joint defense of pending or
anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 10

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS:

MINN NUMBERS: LG 0303277/0303279

TYPE: LT

DATE: 4/22/77

AUTHOR: Hoel DK

RECIPIENT: Ahrensfield TF; Greer
J; Hetsko CF; Pepples
E; Roemer HC; Stevens
AJ; Bryant D; Crohn MH
Jr.; Holtzman A;

Pollack L; Brown JC;
Jacob EJ

REQ NUMBER: 1 RFP 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for certain cigarette manufacturers, to
in-house and counsel for certain cigarette
manufacturers, containing the thoughts,
impressions and legal advice of counsel
concerning contract issues related to funding
for a scientific research project requested by
counsel to assist in the rendering of legal
advice related to a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 0308468

TYPE: LT
DATE: 8/9/66
AUTHOR: Tobacco Research
Council
RECIPIENT: Counsel for tobacco
companies

REQ NUMBER: 1 RFP 30, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Tobacco Research Council to
counsel for certain cigarette manufacturers
requesting legal advice regarding scientific
research on tobacco related to a joint defense
of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 15377
MINN NUMBERS: LG 2000130/2000130

TYPE: LT
DATE: 9/17/64
AUTHOR: Haas F.
RECIPIENT: Old J. cc: Bates W.,
Horan F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Haas, outside
counsel for Liggett, to Liggett executive Old,
Liggett in-house counsel Horan and Liggett
research director Bates providing legal advice
and relating legal advice provided by counsel
for certain cigarette manufacturers regarding
scientific research within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 109278
MINN NUMBERS: LG 2000131/2000131

TYPE: IM
DATE: 5/10/65
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old J.
Anderson J.
Moore

REQ NUMBER: 1 RFP 4, 34, 132

PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Haas, in-house
general counsel at Liggett, to his clients,
Liggett employees and executives, providing
legal advice and the thoughts and impressions of
industry counsel as to the funding of scientific
research and services rendered by a joint
industry litigation consultant within a joint
defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 127446
MINN NUMBERS: LG 2000132/2000132

TYPE: LT
DATE: 10/2/65
AUTHOR: Temko S.
RECIPIENT: General Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Temko, outside
counsel for Liggett and certain cigarette
manufacturers, to his clients, in-house general
counsel for the cigarette manufacturers,
including Liggett, providing legal advice at a
joint industry meeting of litigation counsel
regarding correspondence with a joint industry
litigation consultant, within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 109883
MINN NUMBERS: LG 2000133/2000138

TYPE: IM
DATE: 2/20/64
AUTHOR: Haas F.
RECIPIENT: Toms Z.
Horan F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Memorandum from attorney Haas, outside litigation counsel for Liggett, to Liggett executive and in-house general counsel Horan, providing legal advice as to matters discussed at a meeting of executives and counsel for certain cigarette companies regarding preparation for FTC hearings concerning proposed Trade Regulation Rules within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 1; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2000139/2000144

TYPE: NO
DATE: 12/17/65
AUTHOR: Decker F.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of attorney Decker, outside litigation counsel to Liggett, reflecting the thoughts and mental impressions of counsel concerning meetings of general counsel for certain cigarette manufacturers prepared within a joint

defense of pending or anticipated litigation
REGARDING CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2000145/2000145

TYPE: LT
DATE: 2/23/66
AUTHOR: Yeaman A.
RECIPIENT: Clements E.

Haas F.
Hetsko C.
Ramm H.
Russell
Smith P.

REQ NUMBER: 1 RFP 4, 37, 98
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Brown & Williamson in-house
counsel Yeaman to in-house counsel of other
cigarette manufacturers and executives at The
Tobacco Institute containing the impressions,
thoughts and opinions of counsel, communicated
in a joint defense, in anticipation of pending
or anticipated litigation, respecting matters to
be discussed at a meeting of general counsel,
including CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 8
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 111662
MINN NUMBERS: LG 2000146/2000148

TYPE: IM
DATE: 6/16/66
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old

REQ NUMBER: 1 RFP 4, 34, 37, 128,
132

PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Haas, Liggett
in-house general counsel, to his clients,
Liggett executives and research director,
rendering advice regarding matters discussed at
a meeting of general counsel for cigarette
manufacturers concerning decisions, respecting
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 8
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 123019
MINN NUMBERS: LG 2000149/2000171

TYPE: LT
DATE: 10/11/66
AUTHOR: Hardy D.
RECIPIENT: Haas F.
Hetsko C.
Ramm H. H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 33, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for Liggett and other

cigarette manufacturers, to his clients in-house counsel for cigarette manufacturers, rendering advice concerning decisions, respecting funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 4X
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 123015
MINN NUMBERS: LG 2000172/2000172

TYPE: LT
DATE: 12/2/66
AUTHOR: Yeaman A.
RECIPIENT: Haas
Hetsko C.
Ramm H.
Smith P.
Clements E.
Hardy

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Yeaman, Brown & Williamson general counsel, to in-house counsel of certain cigarette manufacturers, executives at The Tobacco Institute and outside litigation counsel providing legal advice respecting respecting funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2000173/2000175

TYPE: LT
DATE: 10/11/66
AUTHOR: Holtzman A.
RECIPIENT: Ramm H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: JD
DESCRIPTION: Correspondence from attorney Holtzman, counsel
for RJR rendering advice regarding matters made,
within a joint defense of pending or anticipated
litigation regarding operations of CTR.

PRIV A
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 24119
MINN NUMBERS: LG 2000177/2000181

TYPE: LT
DATE: 2/11/67
AUTHOR: Hardy D.
RECIPIENT: Haas F.

Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37, 53
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for Liggett, to his clients,
the general counsel for the cigarette companies,
rendering legal advice regarding the funding of
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 123003
MINN NUMBERS: LG 2000182/2000184

TYPE: LT
DATE: 4/14/67
AUTHOR: Yeaman A.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Clements E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Brown & Williamson in-house
counsel Yeaman to in-house general counsel for
other cigarette manufacturers and executive at
The Tobacco Institute regarding advice
concerning joint defense decisions with respect
to research activities of CTR including CTR
Special Projects research within a joint defense
of pending or anticipated litigation.
PRIV B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 122990
MINN NUMBERS: LG 2000185/2000186

TYPE: LT
DATE: 5/8/67
AUTHOR: Yeaman A.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Clements E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Brown & Williamson in-house
counsel Yeaman to in-house counsel of other
cigarette manufacturers and executive at The
Tobacco Institute concerning decisions
respecting funding of scientific research within
a joint defense of pending or anticipated
litigation and regarding pending legislative
hearings concerning cigarette labeling.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 111182
MINN NUMBERS: LG 2000187/2000260

TYPE: LT
DATE: 5/22/67
AUTHOR: Hardy D.
RECIPIENT: Brown J.
Cohn D.
Cooke E.
Decker F.
Holtzman A.
Jacob E.
Shinn W.
Hoel D.
Carroll K.

REQ NUMBER: 1 RFP 4, 36, 37, 41, 71
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence enclosing position paper from
attorney Hardy, outside litigation counsel for

Liggett to his clients, the general counsel of the cigarette manufacturers and outside litigation counsel for certain other cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel within a joint defense of pending or anticipated litigation and regarding pending legislative hearings concerning cigarette labeling.

PRIV A; B; C
CATEGORY:

SUBJ 1; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 127370
MINN NUMBERS: LG 2000263/2000337

TYPE: LT
DATE: 9/8/67
AUTHOR: Hardy D.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 36, 37, 41, 71
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation counsel for Liggett and the other cigarette manufacturers, to outside litigation counsel for certain other cigarette manufacturers and executive of The Tobacco Institute giving advice, within a joint defense of pending or anticipated litigation, regarding the cigarette manufacturers' position paper on smoking and health issues, position paper enclosed and regarding pending legislative hearings concerning cigarette labeling.

PRIV A; B; C
CATEGORY:

SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 39089
MINN NUMBERS: LG 2000359/2000393

TYPE: IM
DATE: 3/26/69
AUTHOR: Haas F.
RECIPIENT: Harrington M.

REQ NUMBER: 1 RFP 4, 36, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from in-house general counsel
Haas to his client, a Liggett executive, giving
advice as to a joint statement of the cigarette
manufacturers regarding smoking and health
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 5; 6; 8; 10

CATEGORY:

DOCUMENT LOCATION: 5

LIG NUMBERS: 30530
MINN NUMBERS: LG 2000395/2000395

TYPE: IM
DATE: 8/23/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4, 36, 37, 132
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Haas, Liggett
in-house general counsel, to his client, a
Liggett executive, giving legal advice. The
document bears a handwritten notation revealing

information shared by a Philip Morris executive and his outside litigation counsel pursuant to a joint defense of litigation regarding proposed smoking and health research.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 15820
MINN NUMBERS: LG 2000399/2000403

TYPE: IM
DATE: 4/2/73
AUTHOR: Greer J.
RECIPIENT: Mulligan,R.
Haas,F

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Greer to other Liggett in-house counsel and their client, a Liggett executive, concerning a meeting of counsel for the cigarette manufacturers at which meeting advice was rendered concerning decisions made in a joint defense in anticipation of pending or anticipated litigation respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 111585
MINN NUMBERS: LG 2000415/2000416

TYPE: IM
DATE: 7/26/68
AUTHOR: Haas F.
RECIPIENT: Harrington M.

REQ NUMBER: 1 RFP 4, 124, 132
PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Haas, Liggett's
in-house counsel to his client, Liggett's
president, rendering legal advice in
anticipation of litigation regarding funding
decisions respecting CTR Special Projects
research discussed at a meeting of general
counsel for the cigarette manufacturers within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2000417/2000418

TYPE: LT
DATE: 6/3/70
AUTHOR: Hardy D.
RECIPIENT: Haas F.

Hetsko C.
Pollack L.
Ramm H.
Smith P.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for the cigarette
manufacturers, to his clients in-house counsel
for the cigarette manufacturers, giving legal

advice concerning decisions respecting funding
of CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000419/2000419

TYPE: LT
DATE: 6/5/70
AUTHOR: Haas F.
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from Liggett's in-house counsel to
his client, Liggett research director,
discussing joint defense legal strategy in
anticipation of litigation, regarding the
funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 132814
MINN NUMBERS: LG 2000421/2000421

TYPE: LT
DATE: 2/10/71
AUTHOR: Jacob E.

RECIPIENT: Ahrensfeld
Haas F.
Hetsko C.
Roemer
Stevens
Yeaman

REQ NUMBER: 1 RPF 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers to in-house counsel for the
cigarette manufacturers giving legal advice
concerning decisions made within a joint defense
of pending or anticipated litigation, respecting
funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 132815
MINN NUMBERS: LG 2000422/2000423

TYPE: LT
DATE: 2/10/71
AUTHOR: Jacob E.
RECIPIENT: Ahrensfeld
Haas F.
Hetsko C.
Roemer
Stevens
Yeaman

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and outside litigation
counsel for the cigarette manufacturers giving
advice, within a joint defense of pending or
anticipated litigation, concerning decisions
with respect to the funding of scientific

research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16102
MINN NUMBERS: LG 2000429/2000430

TYPE: LT
DATE: 5/21/71
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Hardy, outside
litigation counsel for the cigarette
manufacturers, to his clients in-house general
counsel for the cigarette manufacturers, giving
legal advice, within a joint defense of pending
or anticipated litigation, concerning decisions
with respect to scientific research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000431/2000431

TYPE: IM
DATE: 5/27/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Haas, Liggett
in-house general counsel, to his clients,
Liggett executives, giving legal advice and
discussing joint defense legal strategy, in
anticipation of litigation, concerning decisions
made with respect to the funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000432/2000433

TYPE: IM
DATE: 10/27/71
AUTHOR: Haas F.
RECIPIENT: Harrington M.
McAllister

REQ NUMBER: 1 RFP 4, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Haas, Liggett's
in-house general counsel, to his clients,
Liggett executives, discussing joint defense
legal strategy, in anticipation of litigation,
concerning decisions made with respect to the
funding of CTR Special Projects and
institutional grants research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2000434/2000441

TYPE: IM
DATE: 1/24/72
AUTHOR: Tobacco Institute
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared to assist counsel in the
rendition of legal advice in anticipation of a
joint defense of pending or anticipated
litigation regarding proposed legislation
concerning cigarette labeling, advertising and
taxes.

PRIV B; C
CATEGORY:

SUBJ 1; 2; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 136297
MINN NUMBERS: LG 2000442/2000442

TYPE: IM
DATE: 10/27/72
AUTHOR: Greer J.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Greer to Liggett executive McAllister

(copy to Liggett counsel Haas) providing legal advice and the thoughts and impressions of counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000443/2000456

TYPE: NO
DATE: 3/29/73
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of attorney Greer, Liggett's general counsel, concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2000457/2000461

TYPE: IM
DATE: 4/2/73
AUTHOR: Greer J.
RECIPIENT: Mulligan K.
Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Greer to Liggett in-house counsel Haas
and Liggett executive Mulligan providing legal
advice and the thoughts and mental impressions
of counsel regarding a meeting of counsel and
executives from certain cigarette manufacturers
to discuss issues concerning CTR research within
a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2000462/2000463

TYPE: IM
DATE: 4/11/73
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to Liggett in-house counsel Haas relating
legal advice provided by attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, regarding CTR Special Projects
research within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 64890
MINN NUMBERS: LG 2000464/2000464

TYPE: IM
DATE: 4/11/73
AUTHOR: Greer J.
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to Liggett research director Bates
providing legal advice and the thoughts and
impressions of counsel regarding the funding of
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2000466/2000467

TYPE: IM
DATE: 5/14/73
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 1, 32, 34
PRIVILEGE: WP; AC; JD

DESCRIPTION: Memorandum from attorney Greer, Liggett in-house
counsel, to in-house counsel Haas concerning
legal advice given by their outside litigation
counsel, regarding decisions with respect to the
funding of CTR Special Projects research in
connection with pending or anticipated
litigation within a joint defense.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136292
MINN NUMBERS: LG 2000468/2000468

TYPE: LT
DATE: 8/21/73
AUTHOR: Greer J.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Haas, Liggett's
in-house counsel, to Liggett's attorney, outside
litigation counsel, seeking legal advice, within
a joint defense of pending or anticipated
litigation, concerning decisions with respect to
the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 99831

MINN NUMBERS: LG 2000469/2000474

TYPE: NO
DATE: 11/13/73
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of attorney Greer, Liggett's
general counsel, concerning a meeting of general
counsel for the cigarette manufacturers. The
attorney's notes contain his impressions and
thoughts as to the legal advice given at the
meeting, within a joint defense of pending or
anticipated litigation, including, but not
limited to, the funding of ongoing scientific
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 136273
MINN NUMBERS: LG 2000475/2000475

TYPE: LT
DATE: 12/10/73
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers

providing legal advice and the thoughts and impressions of counsel regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 99927
MINN NUMBERS: LG 2000476/2000482

TYPE: NO
DATE: 1/8/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Greer, Liggett's general counsel, concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 5
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 136272

MINN NUMBERS: LG 2000483/2000483

TYPE: LT
DATE: 5/7/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding the funding of
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136271
MINN NUMBERS: LG 2000488/2000488

TYPE: IM
DATE: 7/11/74
AUTHOR: Haas F.
RECIPIENT: Sloat A. cc: Greer J.

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executive Sloat (copy to
Liggett in-house counsel Greer) providing legal
advice and the thoughts and impressions of
counsel regarding the funding of CTR Special

Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136270
MINN NUMBERS: LG 2000489/2000489

TYPE: IM
DATE: 7/17/74
AUTHOR: Sloat A.
RECIPIENT: Haas F. cc: Greer J.
Bates W.
Welsh D.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett executive Sloat
to Liggett in-house counsel Haas (copies to
Liggett in-house counsel Greer and Liggett
researchers) providing information requested by
counsel to assist in the rendition of legal
advice regarding the funding of CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 64996
MINN NUMBERS: LG 2000495/2000519

TYPE: RP
DATE:
AUTHOR: Committee of General
Counsel
RECIPIENT:
REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Summaries prepared to assist counsel in the
rendition of legal advice in anticipation of a
joint defense of pending or anticipated
litigation concerning CTR Special Projects
research.
PRIV C
CATEGORY:
SUBJ 1; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136248
MINN NUMBERS: LG 2000520/2000521

TYPE: LT
DATE: 2/7/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers,
providing legal advice and enclosing proposal
regarding funding of CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136257
MINN NUMBERS: LG 2000522/2000524

TYPE: LT
DATE: 2/21/75
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding the funding of
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136247

MINN NUMBERS: LG 2000525/2000525

TYPE: LT
DATE: 2/26/75
AUTHOR: Greer J.
RECIPIENT: Shinn W. cc: Hill J.
Sloat A.
Haas F.

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to attorney Shinn, outside counsel for
Liggett and certain cigarette manufacturers,
providing information requested by counsel to
assist counsel in the rendition of legal advice
regarding funding of CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 110334
MINN NUMBERS: LG 2000526/2000531

TYPE: IM
DATE: 4/10/75
AUTHOR: Haas F.
RECIPIENT: Hill J.

REQ NUMBER: 1 RFP 4, 10, 11
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from in-house general counsel at
Liggett to other Liggett in-house general
counsel and Liggett executives rendering advice
concerning the decisions to fund CTR Special
Projects research and joint industry funded
research and concerning paralegal support for
litigating counsel to the cigarette
manufacturers within a joint defense of pending
or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y; 4Z

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136205

MINN NUMBERS: LG 2000532/2000533

TYPE: LT

DATE: 4/28/75

AUTHOR: Shinn W.

RECIPIENT: Ahrensfeld T.

Bryant D.

Hetsko C.

Roemer H.

Stevens A. cc:

Holtzman A.

Pepples E.

Pollack L.

Haas F.

Greer J.

REQ NUMBER: 1 RFP 4, 34, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and Haas and counsel for certain cigarette manufacturers, providing legal advice and enclosing proposal regarding funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136204
MINN NUMBERS: LG 2000544/2000544

TYPE: IM
DATE: 5/8/75
AUTHOR: Haas F.
RECIPIENT: Sloat A. cc: Hill J.
Greer J.

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executive Sloat (copies
to Liggett in-house counsel Hill and Greer)
providing legal advice and the thoughts and
impressions of counsel regarding funding of CTR
Special Projects research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 98897
MINN NUMBERS: LG 2000549/2000549

TYPE: NO
DATE: 5/14/75
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting the thoughts and impressions of
counsel and relating legal advice provided by
counsel for certain cigarette manufacturers
regarding proposed CTR Special Projects research
within a joint defense of pending or anticipated
litigation.
PRIV B; C
CATEGORY:

SUBJ 1; 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 132692
MINN NUMBERS: LG 2000550/2000550

TYPE: LT
DATE: 5/23/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, rendering legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 119811
MINN NUMBERS: LG 2000562/2000566

TYPE: NO
DATE: 12/10/75
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting the thoughts and impressions of
counsel regarding a meeting of counsel for
certain cigarette manufacturers and relating
legal advice provided by counsel for certain
cigarette manufacturers within a joint defense
of pending or anticipated litigation concerning
various joint industry issues including pending
ETS Litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 120141
MINN NUMBERS: LG 2000569/2000573

TYPE: NO
DATE: 12/9/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD; WP
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas reflecting his thoughts and impressions
taken at a joint industry meeting regarding
research activities of CTR within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 136163
MINN NUMBERS: LG 2000574/2000575

TYPE: LT
DATE: 12/29/75
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and Greer and counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and impressions of counsel regarding
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136109
MINN NUMBERS: LG 2000576/2000577

TYPE: LT
DATE: 1/4/76

AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A. cc: Bryant
D.
Crohn M.
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers,
providing legal advice and the thoughts and
impressions of counsel regarding the funding of
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133680
MINN NUMBERS: LG 2000578/2000579

TYPE: LT
DATE: 1/23/76
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Bryant D.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for certain cigarette
manufacturers, including Liggett, to his

clients, in-house counsel for the cigarette manufacturers, and Tobacco Institute executive rendering advice, within a joint defense of pending or anticipated litigation, concerning decisions with respect to funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133691
MINN NUMBERS: LG 2000580/2000580

TYPE: LT
DATE: 1/23/76
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, and Tobacco Institute executive rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136081
MINN NUMBERS: LG 2000581/2000582

TYPE: LT
DATE: 1/28/76
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
cigarette manufacturers, to Liggett in-house
counsel Haas and Greer and counsel for certain
cigarette manufacturers, providing legal advice
and the thoughts and impressions of counsel and
enclosing consultant report regarding the
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136061
MINN NUMBERS: LG 2000584/2000584

TYPE: LT
DATE: 3/17/76
AUTHOR: Hardy D.

RECIPIENT: Ahrensfeld T.
Bryant D.
Greer J.
Hetsko C.
Roemer H.
Stevens A. cc: Haas F.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation attorney for Liggett and other cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000585/2000591

TYPE: NO
DATE: 3/30/76
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of attorney Greer, Liggett's in-house general counsel regarding meeting of general counsel for the cigarette manufacturers and outside litigation counsel which discussed anticipated litigation relating to decisions concerning CTR Special Projects research and institutional grants research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 136058
MINN NUMBERS: LG 2000592/2000592

TYPE: LT
DATE: 4/8/76
AUTHOR: Jacob E.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers, to attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, reflecting information regarding
the funding of CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2000593/2000593

TYPE: LT
DATE: 4/16/76
AUTHOR: Hoel D.

RECIPIENT: Ahrensfeld T.
Bryant D.
Greer J.
Hetsko C.
Roemer H.
Stevens A. cc: Haas F.
Holtzman A.
Pepples E.
Pollack L.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers,
providing legal advice and the thoughts and
mental impressions of counsel regarding the
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136057
MINN NUMBERS: LG 2000594/2000594

TYPE: LT
DATE: 4/28/76
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Bryant D.
Greer J.
Hetsko C.
Roemer H.
Stevens A. cc: Haas F.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000595/2000599

TYPE: NO
DATE: 5/13/76
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel Greer reflecting the thoughts and impressions of counsel and relating legal advice provided by counsel for certain cigarette manufacturers regarding a meeting of counsel for certain cigarette manufacturers regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation regarding pending ICC public smoking litigation and regarding pending CPSC litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 107602
MINN NUMBERS: LG 2000601/2000602

TYPE: LT
DATE: 8/3/76
AUTHOR: Stevens A.
RECIPIENT: Ahrensfeld
Austern H.
Greer J.
Hardy
Hetsko C.
Kornegay
Pepples
Roemer

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Stevens, Lorillard
in-house general counsel to Liggett in-house
counsel Greer and counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and mental impressions of counsel and
enclosed agenda regarding a meeting to discuss
issues concerning research proposals within a
joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 136034
MINN NUMBERS: LG 2000603/2000605

TYPE: LT
DATE: 12/17/76
AUTHOR: Shinn W.

RECIPIENT: Ahrensfeld T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
cigarette manufacturers, to Liggett in-house
counsel Greer and counsel for certain cigarette
manufacturers, providing legal advice and the
thoughts and impressions of counsel regarding
the funding of CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000607/2000607

TYPE: LT
DATE: 1/4/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice concerning decisions made
within a joint defense of pending or anticipated

litigation, respecting funding of CTR Special
Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000608/2000609

TYPE: LT
DATE: 1/14/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 97901
MINN NUMBERS: LG 2000610/2000617

TYPE: NO
DATE: 1/27/77
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting the thoughts and
impressions of counsel and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding proposed hearings
concerning the Toxic Substances Control Act and
pending FTC warning notice and pending smokers'
rights litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 6; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 97814
MINN NUMBERS: LG 2000618/2000621

TYPE: NO
DATE: 2/24/77
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting the thoughts and
impressions of counsel and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding CTR Special Projects
research within a joint defense of pending or
anticipated litigation and regarding pending
smokers' rights litigation and pending FTC
warning notice litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4X; 4Y; 10

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 135948

MINN NUMBERS: LG 2000622/2000624

TYPE: LT

DATE: 3/10/77

AUTHOR: Shinn W.

RECIPIENT: Ahresnfeld T.

Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A. cc: Bryant
D.
Crohn M.
Holtzman A.
Pollack L.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135900
MINN NUMBERS: LG 2000625/2000625

TYPE: LT
DATE: 3/17/77
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.

Bryant D.
Greer J.
Hetsko C.
Roemer H.
Stevens A.
Pollack L.
Holtzman A.
Pepples E.
Haas F.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to Liggett in-house counsel Haas and
counsel for certain cigarette manufacturers),
providing legal advice and the thoughts and
impressions of industry counsel regarding the
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 10344
MINN NUMBERS: LG 2000626/2000627

TYPE: LT

DATE: 3/17/77
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Hoel, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers, as well
as to other outside litigation counsel rendering
advice concerning decisions made within a joint
defense of pending or anticipated litigation,
respecting funding of CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135946
MINN NUMBERS: LG 2000628/2000628

TYPE: LT
DATE: 3/23/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A. cc: Bryant
Crohn
Holtsman
Pollack
Brown
Jacob

REQ NUMBER: 1 RFP 4, 34, 37

PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding the funding of CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135898
MINN NUMBERS: LG 2000629/2000630

TYPE: LT
DATE: 4/19/77
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for another cigarette manufacturer, to counsel for certain cigarette manufacturers providing legal advice and the thoughts and impressions of counsel, within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 63986
MINN NUMBERS: LG 2000631/2000632

TYPE: LT
DATE: 5/9/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 63985
MINN NUMBERS: LG 2000633/2000633

TYPE: IM
DATE: 5/16/77
AUTHOR: Greer J.
RECIPIENT: Dey K.

REQ NUMBER: 1 RFP 4, 34, 37, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house

counsel Greer to Liggett executive Dey providing legal advice and the thoughts and impressions of industry counsel regarding CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 63984
MINN NUMBERS: LG 2000634/2000634

TYPE: IM
DATE: 5/23/77
AUTHOR: Mold J.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 34, 134
PRIVILEGE: AC; JD; WP
DESCRIPTION: Memorandum from Liggett research director Mold to Liggett in-house counsel Greer seeking legal advice and the thoughts and impressions of counsel regarding funding of joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135859
MINN NUMBERS: LG 2000635/2000635

TYPE: LT

DATE: 6/20/77
AUTHOR: Shinn W.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for Liggett, to his client, Liggett's in-house rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of joint industry funded research.

PRIV A
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135851
MINN NUMBERS: LG 2000636/2000637

TYPE: LT
DATE: 8/30/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135774
MINN NUMBERS: LG 2000641/2000642

TYPE: LT
DATE: 1/10/78
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Greer J.
Henson A.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
providing legal advice regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135652
MINN NUMBERS: LG 2000643/2000643

TYPE: LT

DATE: 2/17/78
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer, to outside litigation counsel for
the cigarette manufacturers providing legal
advice regarding CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135732
MINN NUMBERS: LG 2000644/2000645

TYPE: LT
DATE: 2/17/78
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer, to outside litigation counsel for
the cigarette manufacturers providing legal
advice regarding CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135764
MINN NUMBERS: LG 2000646/2000647

TYPE: LT
DATE: 2/24/78
AUTHOR: Jacob E.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for another cigarette
manufacturer to in-house counsel for the
cigarette manufacturers and outside litigation
counsel giving advice, within a joint defense of
pending or anticipated litigation, concerning
decisions with respect to funding of CTR Special
Projects research and joint industry funded
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135602
MINN NUMBERS: LG 2000656/2000656

TYPE: LT
DATE: 8/7/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Henson A.

Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house general counsel for the
cigarette manufacturers, Tobacco Institute
executive and Tobacco Institute Research
Director rendering advice concerning decisions
made within a joint defense of pending or
anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135600
MINN NUMBERS: LG 2000657/2000657

TYPE: LT
DATE: 8/21/78
AUTHOR: Jacob E.
RECIPIENT: Ahrensfeld T.
Crohn M.
Henson A.
Greer J.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for another cigarette
manufacturer to in-house counsel for the
cigarette manufacturers as well as to other
outside litigation counsel giving advice, within
a joint defense of pending or anticipated
litigation, concerning decisions with respect to
joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135578
MINN NUMBERS: LG 2000658/2000659

TYPE: LT
DATE: 8/24/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Greer J.
Henson A.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135480
MINN NUMBERS: LG 2000665/2000666

TYPE: LT
DATE: 10/16/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Henson A.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to counsel for certain
cigarette manufacturers providing legal advice
concerning decisions made within a joint defense
of pending or anticipated litigation, respecting
funding of CTR Special Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135437
MINN NUMBERS: LG 2000667/2000668

TYPE: LT
DATE: 2/1/79
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer, to outside litigation counsel for
the cigarette manufacturers giving advice,
within a joint defense of pending or anticipated
litigation, concerning decisions with respect to
the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135449
MINN NUMBERS: LG 2000669/2000670

TYPE: LT
DATE: 2/5/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation attorney for Liggett and other
cigarette manufacturers, to counsel for certain
cigarette manufacturers providing legal advice
regarding the funding of CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135436
MINN NUMBERS: LG 2000671/2000671

TYPE: LT
DATE: 2/13/79
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135433
MINN NUMBERS: LG 2000672/2000673

TYPE: LT
DATE: 2/14/79
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation attorney for Liggett and other

cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135228
MINN NUMBERS: LG 2000674/2000674

TYPE: LT
DATE: 3/19/79
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for another cigarette manufacturer, to outside litigation counsel for the cigarette manufacturers giving advice, within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135431
MINN NUMBERS: LG 2000675/2000675

TYPE: LT
DATE: 4/4/79
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers, as well
as to other outside litigation counsel for
certain cigarette manufacturers rendering advice
concerning decisions made within a joint defense
of pending or anticipated litigation, respecting
funding of CTR Special Projects research.
PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135247
MINN NUMBERS: LG 2000676/2000677

TYPE: LT
DATE: 4/9/79
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer, to outside litigation counsel for
the cigarette manufacturers giving advice,

within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135427
MINN NUMBERS: LG 2000678/2000679

TYPE: LT
DATE: 4/10/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation attorney for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135374
MINN NUMBERS: LG 2000680/2000680

TYPE: LT
DATE: 4/16/79
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135226
MINN NUMBERS: LG 2000682/2000683

TYPE: LT
DATE: 4/25/79
AUTHOR: Northrip R.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Northrip, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers, as well
as to other outside litigation counsel for
certain cigarette manufacturers providing legal
advice and the thoughts and impressions of
counsel regarding funding of CTR Special
Projects research within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135245
MINN NUMBERS: LG 2000684/2000685

TYPE: LT
DATE: 4/25/79
AUTHOR: Northrip R.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Northrip, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers, as well
as to other outside litigation counsel for
certain cigarette manufacturers providing legal
advice and the thoughts and impressions of
counsel regarding funding of CTR Special
Projects research within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135645
MINN NUMBERS: LG 2000686/2000686

TYPE: LT
DATE: 5/21/79
AUTHOR: McClendon J.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney McClendon, outside
litigation counsel for another cigarette
manufacturer to attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, providing legal advice and the
thoughts and impressions of counsel regarding
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135644
MINN NUMBERS: LG 2000687/2000687

TYPE: LT
DATE: 6/8/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.

Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation attorney for Liggett and other
cigarette manufacturers, to counsel for certain
cigarette manufacturers providing legal advice
and the thoughts and impressions of counsel
regarding the funding of CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 94580
MINN NUMBERS: LG 2000688/2000689

TYPE: LT
DATE: 4/12/74
AUTHOR: Greer J.
RECIPIENT: Cunningham & Walsh

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation counsel for Liggett and other
cigarette manufacturers, to counsel for certain
cigarette manufacturers providing legal advice
and the thoughts and impressions of counsel
regarding the funding of CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93497
MINN NUMBERS: LG 2000690/2000691

TYPE: LT
DATE: 2/14/80
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer to counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and impressions of counsel regarding
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000692/2000697

TYPE: NO
DATE: 2/28/80
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34, 73
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Greer, Liggett's
general counsel, concerning a meeting of general
counsel for the cigarette manufacturers which
notes contain the thoughts and impressions of
the author as to the advice rendered at the
meeting concerning decisions made within a joint
defense of pending or anticipated litigation,
respecting funding of CTR Special Projects
research and respecting pending cigarette
sampling litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4X; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93476
MINN NUMBERS: LG 2000698/2000699

TYPE: LT
DATE: 7/15/80
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer to in-house counsel for the
cigarette manufacturers, as well as to certain
other outside litigation counsel giving advice,
within a joint defense of pending or anticipated
litigation, concerning decisions with respect to
CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93450
MINN NUMBERS: LG 2000701/2000704

TYPE: LT
DATE: 8/8/80
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
litigation counsel for another cigarette
manufacturer to in-house counsel for the
cigarette manufacturers, as well as to certain
other outside litigation counsel giving advice,
within a joint defense of pending or anticipated
litigation, concerning decisions with respect to
CTR Special Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134777
MINN NUMBERS: LG 2000705/2000705

TYPE: LT
DATE: 10/22/80

AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Shinn, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to certain other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134708
MINN NUMBERS: LG 2000706/2000707

TYPE: LT
DATE: 11/7/80
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well

as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134702
MINN NUMBERS: LG 2000708/2000709

TYPE: LT
DATE: 12/3/80
AUTHOR: O'Neil B.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney O'Neil, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134676
MINN NUMBERS: LG 2000710/2000712

TYPE: LT
DATE: 2/4/81
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000713/2000714

TYPE: LT
DATE: 2/16/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.

Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134614
MINN NUMBERS: LG 2000715/2000716

TYPE: LT
DATE: 3/3/81
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Stevens A.
Pepples E.

REQ NUMBER: 1 RFP 4, 37, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134603
MINN NUMBERS: LG 2000717/2000717

TYPE: LT
DATE: 3/3/81
AUTHOR: Hoel D.
RECIPIENT: Crohn M.

Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134584
MINN NUMBERS: LG 2000718/2000720

TYPE: LT
DATE: 4/22/81
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for the cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000721/2000731

TYPE: NO
DATE: 5/20/81
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning

decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and regarding pending FTC warning notice litigation and pending smoking and health litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 134572
MINN NUMBERS: LG 2000732/2000733

TYPE: LT
DATE: 6/11/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000734/2000738

TYPE: NO
DATE: 6/24/81
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and respecting pending legislative hearings concerning cigarette ingredients.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 95413
MINN NUMBERS: LG 2000739/2000740

TYPE: LT
DATE: 9/4/81
AUTHOR: Shinn W.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
Brown J.
Cohn D.

Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, and a cigarette manufacturer executive, as well as to certain other outside litigation counsel for certain cigarette manufacturers, rendering legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting a scheduled meeting of general counsel covering a variety of topics, including the operations of LRD and CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 95403
MINN NUMBERS: LG 2000741/2000750

TYPE: LT
DATE: 9/18/81
AUTHOR: Decker F.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Decker, outside litigation counsel to Liggett, to his client, in-house counsel at Liggett, giving legal advice decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and paralegal support to outside litigation counsel to the cigarette manufacturers.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 4Z

CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 134561
MINN NUMBERS: LG 2000751/2000752

TYPE: LT
DATE: 10/7/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfeld T.
Greer J.
Henson A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel giving advice concerning decisions made within a joint defense of ending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 4X
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93293
MINN NUMBERS: LG 2000753/2000754

TYPE: LT

DATE: 11/5/81
AUTHOR: Stevens A.
RECIPIENT: Finnegan T.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, Lorillard's in-house general counsel, to outside counsel for the Council for Tobacco Research, in-house counsel for the cigarette manufacturers and outside litigation counsel for certain other cigarette manufacturers regarding legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134559
MINN NUMBERS: LG 2000755/2000756

TYPE: LT
DATE: 11/13/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.

Greer J.
Henson A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel giving advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134546
MINN NUMBERS: LG 2000757/2000758

TYPE: LT
DATE: 11/18/81
AUTHOR: O'Neil B.
RECIPIENT: Ahrensfield T.

Greer J.
Henson A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney O'Neil, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel giving advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134521
MINN NUMBERS: LG 2000759/2000760

TYPE: LT
DATE: 11/20/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Greer J.
Henson A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel giving advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93459
MINN NUMBERS: LG 2000761/2000762

TYPE: LT
DATE: 11/24/81
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.
Greer J.
Henson A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Memorandum from attorney Finnegan, outside litigation counsel for another cigarette manufacturers to in-house counsel for the cigarette manufacturers, as well as to certain other outside litigation counsel giving advice, within a joint defense of pending or anticipated litigation, concerning decisions with respect to CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 4X
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2000763/2000766

TYPE: NO
DATE: 12/10/81
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and pending legislative hearings concerning self-extinguishing cigarettes.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 4Z; 6; 8
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93319
MINN NUMBERS: LG 2000767/2000769

TYPE: LT
DATE: 1/14/82
AUTHOR: Jacob E.
RECIPIENT: Ahrensfeld
Greer J.
Henson
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and outside litigation
counsel for the cigarette manufacturers giving
legal advice, within a joint defense of pending
or anticipated litigation, concerning decisions
with respect to the funding of joint industry
funded research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134494
MINN NUMBERS: LG 2000770/2000771

TYPE: LT
DATE: 1/21/82
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfeld T.
Greer J.
Henson A.
Pepples E.
Stevens A.

Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to certain other outside litigation counsel for certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 100246
MINN NUMBERS: LG 2000772/2000772

TYPE: AG
DATE: 5/19/82
AUTHOR: Witt S.
RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 4, 37, 34, 53
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Witt, in-house general counsel for Reynolds to other attorneys for the tobacco manufacturers giving advice, within a joint defense of pending or anticipated litigation, concerning matters to be discussed on a variety of topics including paralegal support for litigating counsel to the cigarette manufacturers for use in anticipation of pending or anticipated litigation concerning FTC consent orders.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4X; 4Y; 6; 8; 10
CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2000773/2000779

TYPE: NO
DATE: 5/25/82
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and respecting pending LRD employment litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y; 4Z; 6; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2000780/2000783

TYPE: NO
DATE:
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD

DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting pending FTC advertising subpoena litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 8; 10

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 93295

MINN NUMBERS: LG 2000784/2000785

TYPE: LT

DATE: 6/30/82

AUTHOR: Finnegan T.

RECIPIENT: Greer J.

Henson
Holtzman
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel rendering legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300002
MINN NUMBERS: LG 2000786/2000787

TYPE: LT
DATE: 1/7/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, as well as to outside litigation
counsel for certain cigarette manufacturers
giving legal advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301249
MINN NUMBERS: LG 2000788/2000791

TYPE: NO
DATE: 1/3/83
AUTHOR: Murray J.

RECIPIENT:

REQ NUMBER: 1 RFP 4

PRIVILEGE: WP; AC; JD

DESCRIPTION: Handwritten notes of Liggett in-house counsel Murray reflecting the thoughts and impressions of industry counsel regarding a meeting of general counsel for certain cigarette manufacturers and relating legal advice provided by counsel for certain cigarette manufacturers regarding CTR Special Projects research, joint industry funded research and litigation support services within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4X; 4Y; 4Z

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 301111

MINN NUMBERS: LG 2000792/2000801

TYPE: LT

DATE: 1/11/83

AUTHOR: Sirridge P.

RECIPIENT: Greer J.

Henson A.

Holtzman A.

Pepples E.

Stevens A.

Witt S.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects and joint industry funded research. Enclosed is a chart of such research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93197
MINN NUMBERS: LG 2000802/2000802

TYPE: LT
DATE: 1/27/83
AUTHOR: Jacob E.
RECIPIENT: Greer J.

Henson
Holtzman
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and outside litigation
counsel for the cigarette manufacturers giving
legal advice, within a joint defense of pending
or anticipated litigation, concerning decisions
with respect to the funding of a CTR Special
Projects research proposal.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301122
MINN NUMBERS: LG 2000805/2000820

TYPE: NO
DATE: 3/31/83
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and respecting pending public smoking litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300035
MINN NUMBERS: LG 2000821/2000822

TYPE: LT
DATE: 4/4/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for certain cigarette

manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of A CTR Special Projects research proposal.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 7
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301138
MINN NUMBERS: LG 2000823/2000832

TYPE: LT
DATE: 4/7/83
AUTHOR: Murray J.
RECIPIENT: Seidensticker R. cc:
Greer J.
Dey K.
Hooker R.

REQ NUMBER: 1 RFP 4, 37, 130, 135
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Murray to Liggett executive Seidensticker (copies to Liggett in-house counsel Greer and Hooker and Liggett executive Dey) providing legal advice and the thoughts and impressions of counsel regarding a meeting of counsel for certain cigarette manufacturers regarding CTR SPECIAL PROJECTS research and relating legal advice provided by counsel for certain cigarette manufacturers and enclosed notes of meeting within a joint defense of pending or anticipated litigation concerning public smoking.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Z; 5; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300039
MINN NUMBERS: LG 2000833/2000834

TYPE: LT
DATE: 4/7/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers to in-house counsel for the
cigarette manufacturers as well as outside
litigating counsel for certain cigarette
manufacturers giving legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301159
MINN NUMBERS: LG 2000836/2000837

TYPE: LT
DATE: 5/13/83
AUTHOR: Stevens A.
RECIPIENT: Chapin

Greer J.
Holtzman
Pepples

Witt
Kornegay
Chilcote
Temko
Shinn

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
general counsel for Lorillard, to in-house
general counsel for the cigarette manufacturers,
Tobacco Institute executive and outside
litigation counsel for certain cigarette
manufacturers giving advice, within a joint
defense of pending or anticipated litigation,
concerning a meeting of counsel for the
cigarette manufacturers which covered the
progress of CTR Special Projects research and
pending asbestos litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93161
MINN NUMBERS: LG 2000838/2000839

TYPE: LT
DATE: 5/16/83
AUTHOR: Finnegan T.
RECIPIENT: Greer J.
Henson
Holtzman
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 37, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and outside litigation
counsel for the cigarette manufacturers giving

legal advice, within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93158
MINN NUMBERS: LG 2000840/2000841

TYPE: LT
DATE: 6/6/83
AUTHOR: Wrobleski C.
RECIPIENT: Greer J.
Henson
Holtzman
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Wrobleski, outside litigation counsel for certain cigarette manufacturers to in-house counsel for the cigarette manufacturers and outside litigation counsel for the cigarette manufacturers giving legal advice, within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300075
MINN NUMBERS: LG 2000842/2000843

TYPE: LT
DATE: 6/9/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers rendering advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300156
MINN NUMBERS: LG 2000844/2000845

TYPE: LT
DATE: 8/10/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers as well as to outside litigation counsel for certain cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of a CTR Special Projects research proposal.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301191
MINN NUMBERS: LG 2000846/2000848

TYPE: LT
DATE: 8/16/83
AUTHOR: Stevens A.
RECIPIENT: Chapin
Greer J.
Holtzman
Pepples
Witt
Kornegay
Chilcote
Shinn
Temko

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, Lorillard in-house counsel, to in-house general counsel for the other cigarette manufacturers, a Tobacco Institute executive and outside litigation counsel for certain cigarette manufacturers giving advice, within a joint defense of pending or anticipated litigation, concerning a meeting of general counsel for cigarette manufacturers

covering a variety of topics including
discussions of CTR Special Projects research,
joint industry funded research and pending
public smoking litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301199
MINN NUMBERS: LG 2000849/2000849

TYPE: LT
DATE: 8/24/83
AUTHOR: Jacob E.
RECIPIENT: Greer J.

Henson
Holtzman
Murray
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers as well as to outside
litigation counsel for the cigarette
manufacturers giving advice, within a joint
defense of pending or anticipated litigation,
concerning decisions with respect to the funding
of CTR Special Projects and joint industry
funded research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301100
MINN NUMBERS: LG 2000850/2000860

TYPE: LT
DATE: 9/1/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside

litigation counsel for the cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of scientific research. Attached are charts on the status of ongoing CTR Special Projects research and joint industry funded research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301100
MINN NUMBERS: LG 2000861/2000867

TYPE: LT
DATE: 9/1/83
AUTHOR: Sirridge P.

RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for the cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of scientific research. Charts covering the status of ongoing CTR Special Projects and joint industry funded research are enclosed.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301223
MINN NUMBERS: LG 2000868/2000873

TYPE: NO
DATE: 10/26/83
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which contain the thoughts and impressions of the author as to the advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y, 8, 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93134
MINN NUMBERS: LG 2000874/2000874

TYPE: LT
DATE: 11/23/83
AUTHOR: Jacob E.
RECIPIENT: Greer J.

Henson
Holtzman
Murray
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from outside litigation counsel
for certain tobacco manufacturers to in-house
counsel for the tobacco manufacturers as well as
to outside litigation counsel for certain
tobacco manufacturers regarding decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of joint industry
funded research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301240
MINN NUMBERS: LG 2000875/2000876

TYPE: LT
DATE: 11/28/83
AUTHOR: Stevens A.
RECIPIENT: Chapin
Greer J.
Holtzman
Pepples
Witt
Chilcote
Kornegay
Shinn
Temko

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
general counsel at Lorillard, to in-house
counsel for other cigarette manufacturers,
outside litigation counsel for certain cigarette
manufacturers and cigarette institute executives
regarding meeting of counsel for the cigarette
manufacturers containing the legal advice of
attorney Stevens made, within a joint defense of
pending or anticipated litigation concerning a
variety of joint industry issues including CTR
Special Projects research and the Surgeon
General's Report, agenda of meeting enclosed.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300181
MINN NUMBERS: LG 2000877/2000878

TYPE: LT
DATE: 12/30/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.

Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from outside litigation counsel
for certain cigarette manufacturers, including
Liggett, to his clients, general counsel for the
cigarette manufacturers as well as to outside
litigation counsel for certain cigarette
manufacturers regarding legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301261
MINN NUMBERS: LG 2000879/2000880

TYPE: LT
DATE: 12/29/83
AUTHOR: Stevens A.
RECIPIENT: Chapin
Greer J.
Holtzman
Pepples
Witt
Chilcote
Kornegay
Shinn
Temko

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
counsel at Lorillard tobacco to in-house counsel
for the cigarette manufacturers, outside
litigation counsel for certain cigarette
manufacturers and Tobacco Institute executives
regarding meeting of general counsel for the

cigarette manufacturers containing legal advice of attorney Stevens concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and respecting a request for certain materials from the EPA.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301089
MINN NUMBERS: LG 2000881/2000891

TYPE: LT
DATE: 1/4/84
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice regarding decisions made within a joint defense of pending or anticipated litigation, respecting the status and funding of CTR Special Projects and joint industry funded research. Chart of the status of ongoing scientific research is enclosed.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301253
MINN NUMBERS: LG 2000892/2000908

TYPE: NO
DATE: 1/11/84
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Murray, Liggett's
general counsel, concerning a meeting of general
counsel for the cigarette manufacturers which
notes contain the thoughts and impressions of
the author as to the advice rendered at the
meeting concerning decisions made within a joint
defense of pending or anticipated litigation,
respecting funding of CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301253
MINN NUMBERS: LG 2000909/2000913

TYPE: NO
DATE: 1/11/84
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett general counsel

Murray concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the legal advice provided by counsel for certain cigarette manufacturers concerning decisions made within a joint defense of pending or anticipated litigation respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300197
MINN NUMBERS: LG 2001005/2001007

TYPE: LT
DATE: 1/23/84
AUTHOR: Sirridge P.
RECIPIENT: Murray J
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers as well as to outside counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301247
MINN NUMBERS: LG 2001008/2001009

TYPE: LT
DATE: 2/2/84
AUTHOR: Stevens A.
RECIPIENT: Holtzman
Pepples
Murray
Witt

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, Lorillard
in-house general counsel, to in-house counsel
for certain cigarette manufacturers providing
legal advice and the thoughts and impressions of
counsel regarding a meeting of counsel for
certain cigarette manufacturers and relating
legal advice provided by counsel for certain
cigarette manufacuters within a joint defense of
pending or anticipated litigation regarding
allocation of litigation and legal resources
concerning legislative hearings and pending
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93101
MINN NUMBERS: LG 2001010/2001011

TYPE: LT
DATE: 2/6/84

AUTHOR: Finnegan T.
RECIPIENT: Henson
Holtzman
Greer J.
Pepples
Stevens
Witt

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for certain other cigarette manufacturers and outside litigation counsel for the manufacturers, giving advice within a joint defense of pending or anticipated litigation, concerning decisions with respect to the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301271
MINN NUMBERS: LG 2001012/2001014

TYPE: NO
DATE: 2/7/84
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which notes contain the thoughts and impressions of the author as to the legal advice rendered at the meeting concerning decisions made within a joint defense of pending or anticipated litigation respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301263
MINN NUMBERS: LG 2001015/2001021

TYPE: NO
DATE: 2/9/84
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Murray, Liggett's
general counsel, concerning a meeting of general
counsel for the cigarette manufacturers which
notes contain the thoughts and impressions of
the author as to the legal advice rendered at
the meeting concerning decisions made within a
joint defense of pending or anticipated
litigation respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300272
MINN NUMBERS: LG 2001022/2001023

TYPE: LT
DATE: 4/9/84
AUTHOR: Sirridge P.
RECIPIENT: Henson A.

Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers as well as to outside litigation
counsel for certain cigarette manufacturers
giving legal advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300274
MINN NUMBERS: LG 2001024/2001025

TYPE: LT
DATE: 4/13/84
AUTHOR: Sirridge P.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers as well as to outside litigation
counsel for certain cigarette manufacturers

giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300232
MINN NUMBERS: LG 2001026/2001035

TYPE: LT
DATE: 5/1/84
AUTHOR: Sirridge P.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects and joint industry funded research. Enclosed is a chart concerning the status of ongoing scientific research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300303
MINN NUMBERS: LG 2001045/2001046

TYPE: LT
DATE: 12/17/84
AUTHOR: Hoel D.
RECIPIENT: Chapin J.
Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt
SB

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, as well as to outside litigation
counsel for certain cigarette manufacturers
giving legal advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300311
MINN NUMBERS: LG 2001047/2001048

TYPE: LT
DATE: 4/5/85

AUTHOR: Hoel D.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers and Tobacco Institute executive as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300326
MINN NUMBERS: LG 2001049/2001049

TYPE: LT
DATE: 4/24/85
AUTHOR: Sirridge P.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his

clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300327
MINN NUMBERS: LG 2001050/2001051

TYPE: LT
DATE: 5/3/85
AUTHOR: Sirridge P.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300368
MINN NUMBERS: LG 2001052/2001052

TYPE: LT
DATE: 5/9/85
AUTHOR: Hoel D.
RECIPIENT: Chapin

JW
Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for certain cigarette manufacturers giving legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301515
MINN NUMBERS: LG 2001053/2001058

TYPE: NO

DATE: 5/15/85
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel concerning a meeting of general counsel for the cigarette manufacturers which contain the thoughts and impressions of the author as to the advice rendered at the meeting regarding decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and respecting pending asbestos and smoking and health litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300415
MINN NUMBERS: LG 2001071/2001072

TYPE: LT
DATE: 7/25/85
AUTHOR: Sirridge P.
RECIPIENT: Henson A.

Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering legal advice concerning decisions made within a joint defense of pending

or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300526
MINN NUMBERS: LG 2001073/2001081

TYPE: LT
DATE: 10/8/85
AUTHOR: Sirridge P.
RECIPIENT: Henson A.

Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, as well as to outside litigation
counsel for Liggett and certain other cigarette
manufacturers rendering legal advice concerning
decisions made, within a joint defense of
pending or anticipated litigation, regarding
funding of scientific research. Enclosed is a
chart covering the status of all ongoing CTR
Special Projects and joint industry funded
research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301533
MINN NUMBERS: LG 2001082/2001086

TYPE: NO
DATE: 11/13/85
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Murray, Liggett's
general counsel which reflect his thoughts and
mental impressions regarding a meeting of
counsel for certain cigarette manufacturers and
relating legal advice provided by counsel for
certain cigarette manufacturers regarding the
funding of CTR Special Projects research within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6, 8, 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301538
MINN NUMBERS: LG 2001087/2001089

TYPE: LT
DATE: 1/17/86
AUTHOR: Holtzman A.
RECIPIENT: Chapin

Cherry
Chilcote
Hoel
Juchatz
Kornegay
Lewis
Murray

Pepples
Randour
Rupp
Schechter
Shinn
Stevens
Temko

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Philip Morris associate
general counsel to in-house counsel for other
cigarette manufacturers, Tobacco Institute
executive and outside litigation counsel for
certain cigarette manufacturers giving advice,
within a joint defense of pending or anticipated
litigation, concerning items to be discussed at
a meeting of general counsel for cigarette
manufacturers covering a variety of topics
including pending smoking and health litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300536
MINN NUMBERS: LG 2001094/2001096

TYPE: LT
DATE: 2/18/86
AUTHOR: Hoel D.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house general counsel for the

cigarette manufacturers, including Liggett, as well as to outside litigation counsel for Liggett and another manufacturer rendering legal advice concerning decisions made, within a joint defense of pending or anticipated litigation, regarding funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300542
MINN NUMBERS: LG 2001101/2001101

TYPE: LT
DATE: 4/1/86
AUTHOR: Hoel D.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering legal advice concerning decisions made, within a joint defense of pending or anticipated litigation, regarding funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300543
MINN NUMBERS: LG 2001102/2001103

TYPE: LT
DATE: 5/8/86
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering legal advice concerning decisions made, within a joint defense of pending or anticipated litigation, regarding funding of CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300557
MINN NUMBERS: LG 2001104/2001104

TYPE: LT
DATE: 6/3/86
AUTHOR: Sirridge P.

RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300599
MINN NUMBERS: LG 2001111/2001119

TYPE: LT
DATE: 10/24/86
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.
Holtzman A.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation

counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding CTR Special Projects research and joint industry funded research. Enclosed is a chart covering the status of ongoing scientific research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300608
MINN NUMBERS: LG 2001120/2001121

TYPE: LT
DATE: 10/24/86
AUTHOR: O'Neil B.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney O'Neil, outside litigation counsel for certain cigarette manufacturers, including Liggett, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers giving legal advice concerning decisions made, within a joint defense of pending or anticipated litigation regarding CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301571
MINN NUMBERS: LG 2001122/2001128

TYPE: NO
DATE: 11/6/86
AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of attorney Murray, Liggett's
general counsel which reflect his thoughts and
mental impressions regarding a meeting of
counsel for certain cigarette manufacturers and
relating legal advice provided by counsel for
certain cigarette manufacturers regarding the
funding of CTR Special Projects within a joint
defense of pending or anticipated litigation and
regarding pending smoking and health litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 300618
MINN NUMBERS: LG 2001129/2001137

TYPE: LT
DATE: 2/13/87
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.

Holtzman A.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett regarding decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research and joint industry funded research. Enclosed is a chart covering the status of ongoing scientific research.
PRIV A; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300636
MINN NUMBERS: LG 2001138/2001138

TYPE: LT
DATE: 3/27/87
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers giving legal advice concerning decisions made, within a joint defense of pending or anticipated litigation, regarding the funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300698
MINN NUMBERS: LG 2001139/2001139

TYPE: LT
DATE: 4/13/87
AUTHOR: Hoel D.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300703
MINN NUMBERS: LG 2001147/2001147

TYPE: LT
DATE: 3/6/89
AUTHOR: Hoel D.
RECIPIENT: Juchatz W.
Murray J.
Newman F.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the manufacturers as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made, within a joint defense of pending or anticipated litigation, regarding funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300699
MINN NUMBERS: LG 2001148/2001151

TYPE: LT
DATE: 4/28/89
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.
Holtzman A.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and other cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers as well as to outside counsel for Liggett and certain other cigarette manufacturers providing legal advice and the thoughts and impressions of counsel and enclosing summary regarding CTR Special Projects research and joint industry funded research within a joint defense of pending or anticipated litigation.
PRIV A; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300851
MINN NUMBERS: LG 2001152/2001152

TYPE: LT
DATE: 10/2/89
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.
PRIV A; B; C

CATEGORY:

SUBJ 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300912

MINN NUMBERS: LG 2001160/2001161

TYPE: LT

DATE: 2/9/90

AUTHOR: Sirridge P.

RECIPIENT: Juchatz W.

Murray J.

Newman F.

Pepples E.

Randour P.

Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300921
MINN NUMBERS: LG 2001162/2001163

TYPE: LT
DATE: 8/31/90
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.

Murray J.
Pepples E.
Randour P.
Stevens A.
Wall C.
Brown J.
Decker F.
Nims M.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 300944
MINN NUMBERS: LG 2001164/2001165

TYPE: LT
DATE: 9/26/90
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.

Murray J.
Pepples E.
Randour P.
Stevens A.

Wall C.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of the joint industry research account.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301001
MINN NUMBERS: LG 2001166/2001166

TYPE: LT
DATE: 4/4/91
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A.
Wall C.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of the joint industry research account.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 301003
MINN NUMBERS: LG 2001167/2001168

TYPE: LT
DATE: 12/10/91
AUTHOR: Sirridge P.
RECIPIENT: Juchatz W.

Murray J.
Pepples E.
Randour P.
Stevens A.
Wall C.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; JD; WP
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for Liggett and certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to outside litigation counsel for Liggett and certain other cigarette manufacturers rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of the joint industry research account.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135897
MINN NUMBERS: LG 2001178/2001178

TYPE: LT
DATE: 4/28/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, as well
as to other outside litigation counsel rendering
advice in a joint defense of pending or
anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2001185/2001193

TYPE: LT
DATE: 2/14/84
AUTHOR: Wrobleski C.
RECIPIENT: Henson A.
Holtzmann A.
Murray J.
Pepples W.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence with memoranda from attorney

Wrobleski, outside litigation counsel for certain cigarette manufacturers to the in-house counsel for other cigarette manufacturers giving legal advice concerning decisions within a joint defense of pending or anticipated litigation regarding pending hearings before the Los Angeles Public Health Commission.

PRIV A; B; C
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 15832
MINN NUMBERS: LG 2002466/2002468

TYPE: LT
DATE: 2/15/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and certain cigarette manufacturers, to his clients in-house counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to CTR Special Projects.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15879
MINN NUMBERS: LG 2002469/2002469

TYPE: LT
DATE: 8/1/73
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield, T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtman A.
Pollack I.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for certain cigarette
manufacturers, to his clients in-house counsel
for the cigarette manufacturers, rendering legal
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15885
MINN NUMBERS: LG 2002470/2002473

TYPE: LT
DATE: 10/30/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.

Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research with the handwritten notes of
Liggett in-house counsel Haas regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15909
MINN NUMBERS: LG 2002474/2002475

TYPE: LT
DATE: 8/14/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Holtzman A.
Korengay H.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain

cigarette manufacturers, to his clients in-house counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to CTR Special Projects research with the handwritten notes of Liggett in-house counsel Haas regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15937
MINN NUMBERS: LG 2002476/2002476

TYPE: IM
DATE: 3/6/72
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Haas to his client, Liggett executive, McAllister, rendering legal advice concerning smoking and health litigation and CTR Special Projects research, including issues relating to joint defense with the handwritten notes of Liggett executive McAllister to Liggett in-house counsel Haas and Murray relating to same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15938
MINN NUMBERS: LG 2002477/2002478

TYPE: LT
DATE: 3/1/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Pollack L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice in a joint defense of pending
or anticipated litigation relating to CTR
Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15950
MINN NUMBERS: LG 2002479/2002479

TYPE: LT
DATE: 1/12/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Holtzman A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice in a joint defense of pending
or anticipated litigation relating to CTR
Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15954
MINN NUMBERS: LG 2002481/2002482

TYPE: IM
DATE: 10/27/71
AUTHOR: Haas F.
RECIPIENT: Harrington M.
McAllister K.

REQ NUMBER: 1 RFP 4, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executives Harrington and
McAllister, rendering legal advice concerning
smoking and health litigation and CTR Special
Projects research, including joint defense
issues.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15957
MINN NUMBERS: LG 2002483/2002484

TYPE: LT
DATE: 10/20/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice in a joint defense of pending
or anticipated litigation relating to CTR
Special Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16129.1
MINN NUMBERS: LG 2002485/2002485

TYPE: LT
DATE: 8/27/73
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation attorney for Liggett and certain cigarette manufacturers, to his clients in-house counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to institutional grants research.

PRIV A
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 16130
MINN NUMBERS: LG 2002486/2002487

TYPE: IM
DATE: 10/27/71
AUTHOR: Haas F.
RECIPIENT: Harrington M.
McAllister K.

REQ NUMBER: 1 RFP 4, 130
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Haas to Liggett executives Harrington and McAllister, rendering legal advice concerning smoking and health litigation and CTR Special Projects research, including joint defense issues.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16132
MINN NUMBERS: LG 2002488/2002488

TYPE: LT
DATE: 10/22/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice in a joint defense of pending
or anticipated litigation relating to CTR
Special Projects research and institutional
grants research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16133
MINN NUMBERS: LG 2002489/2002489

TYPE: IM
DATE: 8/23/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4

PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Haas to Liggett executive McAllister providing legal advice and the thoughts and impressions of counsel concerning smoking and health litigation and institutional grants research within a joint defense of pending or anticipated litigation with the handwritten notes of Liggett executive McAllister to Liggett in-house counsel Haas.

PRIV A
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 16134
MINN NUMBERS: LG 2002490/2002491

TYPE: LT
DATE: 8/20/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and certain cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding institutional grants research within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 16138
MINN NUMBERS: LG 2002492/2002492

TYPE: IM
DATE: 8/23/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive McAllister providing
legal advice concerning smoking and health
litigation and institutional grants research,
including issues relating to joint defense.

PRIV A; B; C
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 16139
MINN NUMBERS: LG 2002493/2002493

TYPE: LT
DATE: 6/15/76
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Greer J.
Hetsko C.
Roemer
H.
Stevens A.
cc: Haas F.
Holtzman A.

Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
providing legal advice and the thoughts and
impressions of counsel regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16179
MINN NUMBERS: LG 2002495/2002495

TYPE: LT
DATE: 5/23/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
providing legal advice and the thoughts and
impressions of counsel regarding CTR Special
Projects research within a joint defense of

pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16180
MINN NUMBERS: LG 2002496/2002496

TYPE: IM
DATE: 5/8/75
AUTHOR: Haas F.
RECIPIENT: Sloat A. cc: Hill J.
Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to his client, Liggett executive, Sloat (cc
to other Liggett counsel) rendering legal advice
concerning CTR Special Projects research,
including issues relating to joint defense.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16181
MINN NUMBERS: LG 2002497/2002497

TYPE: IM
DATE: 5/8/75
AUTHOR: Haas F.
RECIPIENT: Sloat A. cc: Hill J.

Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive Sloat (copies to
Liggett in-house counsel Hill and Greer)
providing legal advice regarding issues
concerning smoking and health litigation and CTR
Special Projects research within a joint defense
of pending or anticipated litigation. Typed
marginalia dated 5/9/75 from attorney Haas
relating to same.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16182
MINN NUMBERS: LG 2002498/2002499

TYPE: LT
DATE: 4/28/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pepples E.
Pollack L.
Haas F.
Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
providing legal advice and the thoughts and
impressions of counsel regarding CTR Special
Projects research within a joint defense of

pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16200
MINN NUMBERS: LG 2002500/2002500

TYPE: LT
DATE: 2/26/75
AUTHOR: Greer J.
RECIPIENT: Shinn W. cc: Hill J.
Sloat A.
Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to outside counsel, Shinn (copies to
Liggett executive and other in-house counsel
Haas), providing legal advice and the thoughts
and impressions of counsel regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16210
MINN NUMBERS: LG 2002501/2002501

TYPE: LT

DATE: 2/26/75
AUTHOR: Greer J.
RECIPIENT: Shinn W. cc: Hill J.
Sloat A.
Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel to
outside counsel, Shinn (copies to Liggett
executive and other in-house counsel Haas),
providing legal advice and the thoughts and
impressions of counsel regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16211
MINN NUMBERS: LG 2002502/2002503

TYPE: LT
DATE: 2/7/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and certain
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
providing legal advice and the thoughts and
impressions of counsel regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16220

MINN NUMBERS: LG 2002504/2002504

TYPE: LT

DATE: 2/25/75

AUTHOR: Shinn W.

RECIPIENT: Ahrensfeld T.

Bryant D.

Haas F.

Hetsko C.

Roemer H.

Stevens A.

cc: Holtzman A.

Pollack L.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and certain cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers, providing legal advice and the thoughts and impressions of counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16233
MINN NUMBERS: LG 2002505/2002506

TYPE: LT
DATE: 8/19/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtzman A.
Kornegay H.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and certain cigarette manufacturers, to his clients in-house counsel for the cigarette manufacturers and Tobacco Institute executive, providing legal advice and the thoughts and impressions of counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16235
MINN NUMBERS: LG 2002507/2002509

TYPE: LT
DATE: 8/14/74
AUTHOR: Finnegan T.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, counsel for CTR, to attorney Hardy, outside litigation

counsel for Liggett and certain cigarette manufacturers relating to work prepared at request of counsel within a joint defense of pending or anticipated litigation regarding joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16238
MINN NUMBERS: LG 2002510/2002510

TYPE: LT
DATE: 8/22/72
AUTHOR: Jacob E.
RECIPIENT: Ahrensfield
Bryant
Haas
Hetsko
Roemer
Stevens
Hardy D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, counsel for CTR, to in-house attorneys for cigarette manufacturers and their outside litigation counsel, Hardy, relating to work prepared at request of counsel within a joint defense of pending or anticipated litigation regarding a research proposal.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16239
MINN NUMBERS: LG 2002511/2002511

TYPE: LT
DATE: 7/7/72
AUTHOR: Haas F.
RECIPIENT: Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to attorney Jacob, counsel for CTR,
relating to work prepared at request of counsel
within a joint defense of pending or anticipated
litigation regarding a research proposal.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16240
MINN NUMBERS: LG 2002512/2002512

TYPE: IM
DATE: 7/6/72
AUTHOR: Haas F.
RECIPIENT: McAllister K. cc:
Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive McAllister providing
legal advice and the thoughts and impressions of
counsel regarding smoking and health litigation
and a research proposal within a joint defense
of pending or anticipated litigation with the
handwritten notes of Liggett executive
McAllister to Liggett in-house counsel Haas
(copy to Liggett executive Murphy) relating to

same.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16241
MINN NUMBERS: LG 2002513/2002514

TYPE: LT
DATE: 7/5/72
AUTHOR: Jacob E.
RECIPIENT: Ahrensfeld
Bryant
Haas
Hetsko
Roemer
Stevens cc: Hardy D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, counsel for
CTR, to in-house counsel for cigarette
manufacturers and their outside litigation
counsel, Hardy, providing information relating
to work prepared at request of counsel within a
joint defense of pending or anticipated
litigation regarding a research proposal.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16251

MINN NUMBERS: LG 2002515/2002515

TYPE: IM
DATE: 7/6/72
AUTHOR: Haas F.
RECIPIENT: McAllister K. cc:
Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive McAllister providing
legal advice and the thoughts and impressions of
industry counsel regarding smoking and health
litigation and a research proposal within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16253
MINN NUMBERS: LG 2002516/2002516

TYPE: IM
DATE: 1/13/72
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive McAllister providing
legal advice and the thoughts and impressions of
industry counsel regarding smoking and health
litigation and CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16254
MINN NUMBERS: LG 2002517/2002518

TYPE: LT
DATE: 1/10/72
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16267
MINN NUMBERS: LG 2002519/2002519

TYPE: LT
DATE: 3/18/69

AUTHOR: Holtzman A.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from counsel for other tobacco
manufacturers to Liggett in-house counsel Haas
concerning legal issues within a joint defense
relating to smoking and health regarding CTR
Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16318
MINN NUMBERS: LG 2002520/2002524

TYPE: LT
DATE: 5/19/67
AUTHOR: Shinn W.
RECIPIENT: Holtzman A. cc: Decker
F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to outside counsel for
tobacco manufacturers, rendering advice in a
joint defense of pending or anticipated
litigation relating to CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16645
MINN NUMBERS: LG 2002526/2002527

TYPE: LT
DATE: 9/9/70
AUTHOR: Hardy D.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation attorney for Liggett and other tobacco manufacturers, to his clients in-house counsel for the tobacco manufacturers, providing legal advice and the thoughts and impressions of industry counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation with the handwritten notes of Liggett in-house counsel Haas regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16735
MINN NUMBERS: LG 2002530/2002530

TYPE: LT
DATE: 7/18/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield, T.
Bryant D.
Haas F.
Hetsko C.

Roemer H.
Stevens A.
cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for certain cigarette
manufacturers, to his clients in-house counsel
for the cigarette manufacturers, rendering legal
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16742
MINN NUMBERS: LG 2002531/2002531

TYPE: LT
DATE: 4/7/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special

Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16745
MINN NUMBERS: LG 2002532/2002532

TYPE: LT
DATE: 3/4/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Pollack L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16746
MINN NUMBERS: LG 2002533/2002533

TYPE: LT
DATE: 2/28/74
AUTHOR: Haas F.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house attorney
Haas to attorney Shinn, outside litigation
attorney for Liggett and other tobacco
manufacturers, concerning legal issues raised in
a joint defense of pending or anticipated
litigation relating to CTR Special Projects
research and institutional grants research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16747
MINN NUMBERS: LG 2002534/2002534

TYPE: LT
DATE: 2/26/74
AUTHOR: Shinn W.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his client Haas,
rendering advice in a joint defense of pending
or anticipated litigation relating to CTR
Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16750
MINN NUMBERS: LG 2002535/2002535

TYPE: IM
DATE: 2/15/74
AUTHOR: Haas F.
RECIPIENT: Sloat A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house attorney
Haas to his client, Liggett executive, rendering
advice relating to pending or anticipated
litigation, including issues relating to CTR
Special Projects research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16751
MINN NUMBERS: LG 2002536/2002536

TYPE: LT
DATE: 2/14/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtzman A.

Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice within a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16753
MINN NUMBERS: LG 2002537/2002537

TYPE: IM
DATE: 2/11/74
AUTHOR: Haas F.
RECIPIENT: Sloat A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house attorney
Haas to his client, Liggett executive, rendering
advice relating to pending or anticipated
litigation, including issues relating to CTR
Special Projects research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16754
MINN NUMBERS: LG 2002538/2002539

TYPE: LT
DATE: 2/5/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16763
MINN NUMBERS: LG 2002541/2002541

TYPE: LT
DATE: 8/1/73
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16781
MINN NUMBERS: LG 2002542/2002542

TYPE: LT
DATE: 6/25/73
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Ad Hoc Committee
Holtzman A.
Pollack L.
Korengay H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16787
MINN NUMBERS: LG 2002543/2002543

TYPE: LT
DATE: 11/21/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16790

MINN NUMBERS: LG 2002544/2002545

TYPE: LT
DATE: 8/14/75
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A.
cc: Holtzman A.
Kornegay H.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers and
Tobacco Institute executive, rendering advice in
a joint defense of pending or anticipated
litigation relating to CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16817
MINN NUMBERS: LG 2002546/2002549

TYPE: LT
DATE: 6/13/72
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Pollock

L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16938
MINN NUMBERS: LG 2002551/2002551

TYPE: LT
DATE: 3/18/75
AUTHOR: Haas F.
RECIPIENT: Hoel D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to attorney Hoel, outside litigation
attorney for Liggett and other tobacco
manufacturers, regarding CTR Special Projects
research within a joint defense of pending or
anticipated litigation.
PRIV A; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16941
MINN NUMBERS: LG 2002552/2002552

TYPE: IM
DATE: 1/14/75
AUTHOR: Haas F.
RECIPIENT: Sloat A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive Sloat providing legal
advice and the thoughts and impressions of
industry counsel regarding CTR Special Projects
research within a joint defense of pending or
anticipated litigation. Handwritten notes from
Liggett executive Sloat to attorney Haas
relating to same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16942
MINN NUMBERS: LG 2002553/2002554

TYPE: LT
DATE: 12/31/74
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:Holtzman
A.
Korengay H.
Pollack L.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers and
Tobacco Institute executive, rendering advice in
a joint defense of pending or anticipated
litigation relating to CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16945
MINN NUMBERS: LG 2002555/2002555

TYPE: IM
DATE: 1/14/75
AUTHOR: Haas F.
RECIPIENT: Sloat A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house attorney
Haas to his client, Liggett executive, rendering
advice relating to pending or anticipated
litigation, including issues relating to CTR
Special Projects research within a joint defense.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16950
MINN NUMBERS: LG 2002556/2002557

TYPE: LT
DATE: 1/17/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:Holtzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17056.1
MINN NUMBERS: LG 2002558/2002558

TYPE: IM
DATE:
AUTHOR: Hill J.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Hill to Liggett in-house counsel Greer providing
legal advice and the thoughts and impressions of
industry counsel regarding CTR Special Projects
research within a joint defense of pending or

LIG NUMBERS: 17088
MINN NUMBERS: LG 2002561/2002563

TYPE: LT
DATE: 5/24/74
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17093
MINN NUMBERS: LG 2002564/2002566

TYPE: LT
DATE: 5/24/74
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17098
MINN NUMBERS: LG 2002568/2002570

TYPE: LT
DATE: 7/11/73
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17127
MINN NUMBERS: LG 2002571/2002571

TYPE: LT
DATE: 6/14/73
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Pollack
L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17138
MINN NUMBERS: LG 2002572/2002572

TYPE: IM
DATE: 6/20/72
AUTHOR: Haas F.

RECIPIENT: McAllister K.cc:
Harrington M.

REQ NUMBER: 1 RFP 4, 130
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett executive McAllister providing
legal advice and the thoughts and impressions of
industry counsel regarding smoking and health
litigation and CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17139
MINN NUMBERS: LG 2002573/2002576

TYPE: LT
DATE: 6/13/72
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17173
MINN NUMBERS: LG 2002577/2002577

TYPE: IM
DATE: 1/13/72
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to his client, Liggett executive,
McAllister, rendering legal advice concerning
smoking and health litigation and CTR Special
Projects research, including issues relating to
joint defense.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17174
MINN NUMBERS: LG 2002578/2002578

TYPE: LT
DATE: 1/10/72
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.

Roemer H.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to joint
industry funded research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17182
MINN NUMBERS: LG 2002579/2002580

TYPE: LT
DATE: 1/28/76
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17213
MINN NUMBERS: LG 2002581/2002582

TYPE: LT
DATE: 7/23/74
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Holzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17240

MINN NUMBERS: LG 2002583/2002583

TYPE: IM
DATE: 10/27/72
AUTHOR: Greer J.
RECIPIENT: McAllister cc: Haas F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to his client, Liggett executive,
McAllister, rendering legal advice concerning
smoking and health litigation and institutional
grants research, including issues relating to
joint defense. Handwritten notes from Liggett
executive McAllister to Liggett in-house counsel
Greer, and from Liggett in-house counsel Haas to
McAllister, relating to same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17241
MINN NUMBERS: LG 2002584/2002586

TYPE: LT
DATE: 10/12/72
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house

counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to institutional grants research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17258
MINN NUMBERS: LG 2002587/2002588

TYPE: IM
DATE: 10/27/71
AUTHOR: Haas F.
RECIPIENT: Harrington M.
McAllister K.

REQ NUMBER: 1 RFP 4, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to his clients, Liggett executives
Harrington and McAllister, rendering legal
advice concerning smoking and health litigation
and CTR Special Projects research and
institutional grants research, including joint
defense issues.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17260
MINN NUMBERS: LG 2002589/2002589

TYPE: LT
DATE: 10/22/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to institutional
grants research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17261
MINN NUMBERS: LG 2002590/2002591

TYPE: LT
DATE: 10/12/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc:
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other tobacco manufacturers, to his clients in-house counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to institutional grants research. Handwritten marginalia from Liggett in-house counsel Haas relating to same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17278
MINN NUMBERS: LG 2002592/2002592

TYPE: IM
DATE: 11/30/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Haas to Liggett executive McAllister providing legal advice and the thoughts and impressions of industry counsel regarding smoking and health litigation and CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17279
MINN NUMBERS: LG 2002593/2002593

TYPE: LT
DATE: 11/30/71
AUTHOR: Haas F.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to attorney Hardy, outside litigation
attorney for Liggett and other tobacco
manufacturers, concerning the joint defense of
pending or anticipated litigation relating to
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17280
MINN NUMBERS: LG 2002594/2002594

TYPE: IM
DATE: 11/30/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to Liggett executive McAllister, providing
legal advice and the thoughts and impressions of
counsel regarding smoking and health litigation
and CTR Special Projects research within a joint
defense of pending or anticipated litigation
with the handwritten notes of Liggett executive
McAllister to Liggett in-house counsel Greer
(copy to Liggett executive Murphy) relating to
same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17282
MINN NUMBERS: LG 2002596/2002597

TYPE: LT
DATE: 11/9/71
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hotske C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17328
MINN NUMBERS: LG 2002598/2002599

TYPE: LT
DATE: 11/9/71
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17410
MINN NUMBERS: LG 2002600/2002600

TYPE: LT
DATE: 5/19/67
AUTHOR: Hardy D.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for certain cigarette
manufacturers, to his clients in-house counsel

for the cigarette manufacturers, rendering legal advice in a joint defense of pending or anticipated litigation relating to CTR Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16952
MINN NUMBERS: LG 2002601/2002602

TYPE: LT
DATE: 12/21/73
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Gardner
W.
Holtzman A.
Pollack L.
Korengay H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation attorney for Liggett and other tobacco manufacturers, to his clients in-house counsel for the tobacco manufacturers and Tobacco Institute executive, rendering advice in a joint defense of pending or anticipated litigation relating to institutional grants research.

PRIV A
CATEGORY:

SUBJ 1; 12
CATEGORY:
DOCUMENT LOCATION: 12

LIG NUMBERS: 16981
MINN NUMBERS: LG 2002603/2002603

TYPE: IM
DATE: 7/17/74
AUTHOR: Sloat A.
RECIPIENT: Haas F. cc: Greer J.
Bates W.
Welsh D.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett executive Sloat to Liggett in-house counsel Haas (copies to Liggett in-house counsel Greer and Liggett executives) providing information to assist industry counsel in the rendition of legal advice regarding CTR Special Projects research within a joint defense of pending or anticipated litigation with the handwritten notes of attorney Haas regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16982
MINN NUMBERS: LG 2002604/2002604

TYPE: IM
DATE: 7/11/74
AUTHOR: Haas F.
RECIPIENT: Sloat A. cc: Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house attorney

Haas to his client, Liggett executive (copy to Liggett in-house counsel Greer, providing legal advice and the thoughts and impressions of industry counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16983
MINN NUMBERS: LG 2002605/2002605

TYPE: LT
DATE: 7/3/74
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc:
Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation attorney for Liggett and other tobacco manufacturers, to his clients in-house counsel for the tobacco manufacturers, rendering advice in a joint defense of pending or anticipated litigation relating to CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16996
MINN NUMBERS: LG 2002607/2002607

TYPE: LT
DATE: 6/25/74
AUTHOR: Hardy D.
RECIPIENT: Ahresnfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17056
MINN NUMBERS: LG 2002608/2002608

TYPE: LT
DATE: 10/1/75
AUTHOR: Greer J.
RECIPIENT: Shinn W. cc: Hill

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel

Greer to attorney Shinn (copy to Liggett in-house counsel Hill), outside litigation attorney for Liggett and other tobacco manufacturers, providing information to assist industry counsel in the rendition of legal advice regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93295
MINN NUMBERS: LG 2002609/2002610

TYPE: LT
DATE: 6/30/82
AUTHOR: Finnegan T.
RECIPIENT: Greer

Henson
Holtzman
Pepples
Stevens
Witt cc: Brown J.
Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigating counsel for certain tobacco entities to counsel for tobacco companies, including in-house counsel and outside litigating counsel, rendering legal advice concerning decisions made in a joint defense, in anticipation of pending or threatened litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002611/2002612

TYPE: LT
DATE: 1/7/86
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigating counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, as well as to outside litigating
counsel for certain cigarette manufacturers
giving legal advice concerning decisions made in
a joint defense in anticipation of pending or
threatened litigation, respecting funding of CTR
Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 122606
MINN NUMBERS: LG 2002613/2002616

TYPE: NO
DATE: 1/10/83

AUTHOR: Murray J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Murray reflecting the thoughts and impressions
of industry counsel and relating legal advice
provided by counsel for certain cigarette
manufacturers concerning a meeting of general
counsels for certain cigarette manufacturers
regarding CTR Special Projects research, joint
industry funded research, regarding the
information retrieval system to be used to
assist council in the joint defense of pending
or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2002617/2002626

TYPE: LT
DATE: 1/11/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigating counsel for certain cigarette
manufacturers, including Liggett, to his
clients, in-house counsel for the cigarette
manufacturers, as well as to outside litigating
counsel for certain cigarette manufacturers
giving legal advice concerning decisions made in

a joint defense in anticipation of pending or threatened litigation, respecting funding of CTR Special Projects and joint industry funded research. Enclosed is a chart of on-going scientific research.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002627/2002627

TYPE: LT
DATE: 1/27/83
AUTHOR: Jacob E.
RECIPIENT: Greer

Henson
Holtzman
Pepples
Stevens
Witt
cc: Shinn
Brown

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside litigating counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and outside litigating counsel for the cigarette manufacturers, giving legal advice within a joint defense of pending or threatened litigation, concerning decisions with respect to the funding of joint industry funded research

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002628/2002629

TYPE: LT
DATE: 3/23/83
AUTHOR: Stevens A.
RECIPIENT: Chapin J.

Greer J.
Holtzman A.
Pepples E.
Witt S.
Kornegay H.
Shinn W.
Temko S.
cc: Chilcote S.
Rupp J.
Henson A.
Jacob E.
Cherry J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
general counsel for Lorillard, to in-house
general counsel for the cigarette manufacturers,
Tobacco Institute executive and outside
litigating counsel for certain cigarette
manufacturers, providing legal advice and
enclosed agenda reflecting the same concerning a
meeting of counsel for certain cigarette
manufacturers regarding various joint industry
issues including proposed legislation concerning
health warning notices and products liability,
regarding the information retrieval system to be
used to assist counsel in the joint defense of
pending or anticipated litigation pending public
smoking litigation and CTR Special Projects
research.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 132861
MINN NUMBERS: LG 2002630/2002632

TYPE: NO
DATE:
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett counsel reflecting thoughts and impressions of industry counsel, including advice provided by attorneys for cigarette manufacturers, within a joint defense of pending or anticipated litigation regarding CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136035
MINN NUMBERS: LG 2002633/2002634

TYPE: IM
DATE:
AUTHOR: Finnegan T.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturer, to outside litigation counsel for certain cigarette manufacturers providing legal advice and the thoughts and impressions of counsel regarding CTR Special Projects research within a joint defense of pending or anticipated

litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15567
MINN NUMBERS: LG 2002635/2002638

TYPE: IM
DATE: 11/18/65
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old J.
Anderson S.
Moore

REQ NUMBER: 1 RFP 4, 34, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house general
counsel to Liggett executives providing legal
advice as to the funding of institutional grants
and CTR Special Projects research and reflecting
industry counsel's thoughts and mental
impressions regarding the same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15574
MINN NUMBERS: LG 2002639/2002639

TYPE: IM
DATE: 11/23/65
AUTHOR: Haas F.
RECIPIENT: Harrington M.

REQ NUMBER: 1 RFP 4, 36, 41, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house general
counsel to his client, Liggett executive,
providing legal advice as to the funding of
institutional grants and CTR Special Projects
research within a joint defense of pending or
anticipated litigation, and reflecting industry
counsel's thoughts and mental impressions
regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002640/2002640

TYPE: NO
DATE: 1/1/66
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Notes of Liggett in-house counsel Haas
reflecting the thoughts and mental impressions
of counsel regarding institutional grants and
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002641/2002641

TYPE: IM
DATE: 1/10/66
AUTHOR: Haas F.
RECIPIENT: Harrington M.

REQ NUMBER: 1 RFP 4, 34, 37,132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Haas to
Liggett executive providing legal advice and the
thoughts and impressions of industry counsel
regarding CTR Special Projects and institutional
grants research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002642/2002642

TYPE: IM
DATE: 3/9/66
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old J.

REQ NUMBER: 1 RFP 4, 34, 37, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Haas to
Liggett executive providing legal advice and the
thoughts and impressions of industry counsel
regarding CTR Special Projects and institutional
grants research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24149
MINN NUMBERS: LG 2002643/2002643

TYPE: LT
DATE: 11/30/66
AUTHOR: Yeaman A.
RECIPIENT: Hardy D. cc: Haas
Hetsko
Ramm
Smith

REQ NUMBER: 1 RFP 4, 32, 34, 128
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from general counsel for Brown & Williamson to Hardy, outside litigation counsel for Liggett and other cigarette manufacturers and in-house counsel for cigarette manufacturers concerning legal issues concerning CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y; 4X
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24148
MINN NUMBERS: LG 2002644/2002644

TYPE: LT

DATE: 12/7/66
AUTHOR: Haas F.
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 32, 34, 128
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett general counsel to
Liggett researcher requesting information
necessary for the rendition of legal advice
within a joint defense of pending or anticipated
litigation regarding CTR Special Projects
research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24146
MINN NUMBERS: LG 2002645/2002646

TYPE: LT
DATE: 12/9/66
AUTHOR: Bates W.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34, 134
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett researcher Bates to
Liggett general counsel Haas providing
information to assist industry counsel in the
rendition of legal advice and confirming
discussion between Bates and Haas, relating to
CTR Special Projects research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24118
MINN NUMBERS: LG 2002647/2002647

TYPE: LT
DATE: 2/28/67
AUTHOR: Bates W.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34, 134
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett researcher, Bates,
to Liggett general counsel, Haas, responding to
request from Haas for information necessary for
rendition of legal advice, and confirming
discussion between Bates and Haas, all relating
to CTR Special Projects research for use within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2002648/2002649

TYPE: LT
DATE: 4/7/67
AUTHOR: Hardy D.
RECIPIENT: Yeaman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for the cigarette
manufacturers, to his client, general counsel
for Brown & Williamson, providing legal advice
concerning decisions made within a joint defense
of pending or anticipated litigation respecting

PRIV funding of CTR Special Projects research.
A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25025
MINN NUMBERS: LG 2002650/2002651

TYPE: LT
DATE: 10/21/68
AUTHOR: Hardy D.
RECIPIENT: Haas F.

Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 64768
MINN NUMBERS: LG 2002652/2002654

TYPE: NO
DATE: 1/30/70
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas reflecting the thoughts and mental
impressions of industry counsel regarding the
funding of CTR Special Projects research and
relating legal advice provided by counsel for
certain cigarette manufacturers regarding the
same within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25010
MINN NUMBERS: LG 2002655/2002655

TYPE: LT
DATE: 5/5/70
AUTHOR: Hotzman A.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from general counsel for Philip
Morris to Hardy, outside litigation counsel for
Liggett and other cigarette manufacturers and
in-house counsel for cigarette manufacturers
concerning legal issues concerning CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25004
MINN NUMBERS: LG 2002656/2002657

TYPE: LT
DATE: 5/18/70
AUTHOR: Shinn W.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Stevens A. Yeaman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice and the
thoughts and impressions of counsel regarding
CTR Special Projects research within a joint
defense of pending or anticipated litigation
with notes of Liggett counsel Haas concerning
the same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16115
MINN NUMBERS: LG 2002658/2002658

TYPE: LT
DATE: 5/21/70
AUTHOR: Shinn W.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Stevens A.
Yeaman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25002
MINN NUMBERS: LG 2002659/2002659

TYPE: LT
DATE: 5/26/70
AUTHOR: Bates W.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34, 134
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett researcher, Bates, to Liggett general counsel, Haas, concerning information provided by Haas relating to CTR Special Projects research for use within a joint defense of pending or anticipated litigation.
PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25001
MINN NUMBERS: LG 2002660/2002660

TYPE: LT
DATE: 5/27/70
AUTHOR: Haas F.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett general counsel to Shinn, outside litigation counsel for Liggett and other cigarette manufacturers and in-house counsel concerning legal issues concerning CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24998
MINN NUMBERS: LG 2002661/2002663

TYPE: IM
DATE: 6/1/70
AUTHOR: Gallup D.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by Philip Morris legal

assistant to the assistant general counsel of Philip Morris reflecting legal advice and the thoughts and impressions of industry counsel in connection with joint defense of pending or anticipated litigation regarding CTR Special Projects research.

PRIV C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24997
MINN NUMBERS: LG 2002664/2002664

TYPE: LT
DATE: 6/2/70
AUTHOR: Holtzman A.
RECIPIENT: Bates W. cc: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34, 128
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Philip Morris assistant general counsel to Liggett researcher and in-house counsel requesting information necessary for rendition of legal advice and for use in joint defense of pending or anticipated litigation CTR Special Projects research.

PRIV B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16114
MINN NUMBERS: LG 2002665/2002665

TYPE: TG
DATE: 6/4/70
AUTHOR: Hardy D.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Telegram from attorney Hardy, outside litigation
counsel for certain cigarette manufacturers, to
his client, Haas, Liggett general counsel
concerning legal advice relating to decisions
made within a joint defense of pending or
anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 132864
MINN NUMBERS: LG 2002666/2002672

TYPE: NO
DATE: 1/29/71
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting the thoughts and impressions of
industry counsel and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding issues concerning a
joint defense of pending or anticipated
litigation concerning institutional grants
research and CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16093
MINN NUMBERS: LG 2002673/2002673

TYPE: IM
DATE: 6/2/71
AUTHOR: Murphy J.
RECIPIENT: Haas F. cc: McAllister
K.

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from Liggett executive Murphy to
Liggett in-house counsel (copy to Liggett
executive) concerning Liggett's decision to
agree to fund CTR Special Projects research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16085
MINN NUMBERS: LG 2002674/2002675

TYPE: LT
DATE: 7/6/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman

A.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24972
MINN NUMBERS: LG 2002676/2002678

TYPE: LT
DATE: 7/6/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Pollack
L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24971
MINN NUMBERS: LG 2002679/2002679

TYPE: IM
DATE: 7/8/71
AUTHOR: Haas F.
RECIPIENT: McAllister K.

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Haas to
Liggett executive providing legal advice and the
thoughts and impressions of industry counsel
relating to CTR Special Projects research for
use in joint defense of pending or anticipated
litigation with the handwritten notes of Liggett
in-house counsel Haas and Liggett executive
McAllister relating to same.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16080
MINN NUMBERS: LG 2002680/2002680

TYPE: LT
DATE: 7/27/71
AUTHOR: Shinn W.

RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16039
MINN NUMBERS: LG 2002681/2002681

TYPE: LT
DATE: 8/19/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Shinn, outside
litigation attorney for Liggett and other

tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16030
MINN NUMBERS: LG 2002682/2002682

TYPE: LT
DATE: 10/6/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16021
MINN NUMBERS: LG 2002683/2002683

TYPE: LT
DATE: 10/6/71
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 15956
MINN NUMBERS: LG 2002684/2002684

TYPE: LT
DATE: 10/22/71
AUTHOR: Shinn W.

RECIPIENT: Ahrensfield T.
Bryant H.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Holtzman
A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation attorney for Liggett and other
tobacco manufacturers, to his clients in-house
counsel for the tobacco manufacturers, rendering
advice in a joint defense of pending or
anticipated litigation relating to CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16815
MINN NUMBERS: LG 2002685/2002685

TYPE: IM
DATE: 6/22/72
AUTHOR: Murphy J.
RECIPIENT: Kelly J.
cc: Haas F.

REQ NUMBER: 1 RFP 4, 34, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett executive Murphy to
Liggett executive Kelly (copy to Liggett
in-house counsel Haas) relating legal advice
provided by Haas concerning CTR Special Projects
research to be undertaken by Liggett and other
cigarette manufacturers to assist in the joint
defense of pending or anticipated litigation.
Document includes handwritten notes of Haas
relating to same.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 64893
MINN NUMBERS: LG 2002686/2002686

TYPE: IM
DATE: 4/11/73
AUTHOR: Greer J.
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett general counsel to
Liggett research director Bates requesting
information to assist industry counsel in the
rendition of legal advice regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27035
MINN NUMBERS: LG 2002687/2002688

TYPE: IM
DATE: 5/14/73
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34

PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from attorney Greer, Liggett in-house
counsel, to in-house counsel Haas concerning
legal advice given by their outside litigation
counsel, regarding decisions with respect to the
funding of CTR Special Projects research in
connection with pending or anticipated
litigation within a joint defense.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 29695
MINN NUMBERS: LG 2002689/2002690

TYPE: IM
DATE: 5/14/73
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from attorney Greer, Liggett in-house
counsel, to in-house counsel Haas concerning
legal advice given by their outside litigation
counsel, regarding decisions with respect to the
funding of CTR Special Projects research in
connection with pending or anticipated
litigation within a joint defense and with
respect to research activities of the Tobacco
Working Group of the National Cancer Institute.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24927
MINN NUMBERS: LG 2002691/2002692

TYPE: LT
DATE: 7/5/73
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Pollack
L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24877
MINN NUMBERS: LG 2002693/2002695

TYPE: LT
DATE: 11/7/73
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.

Hetsko C.
Roemer H.
Stevens A.
Yeaman A. cc: Pollack
L.
Holtzman A.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24876
MINN NUMBERS: LG 2002696/2002696

TYPE: IM
DATE: 11/26/73
AUTHOR: Haas F.
RECIPIENT: Mulligan cc: Old

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Haas to Liggett executives providing legal advice and the thoughts and impressions of counsel relating to CTR Special Projects research for use in joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65079
MINN NUMBERS: LG 2002697/2002699

TYPE: NO
DATE: 5/21/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 32, 34
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting the thoughts and mental
impressions of industry counsel and relating
legal advice provided by counsel for certain
cigarette manufacturers regarding funding of CTR
Special Projects research, joint industry funded
research and institutional grants research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16940
MINN NUMBERS: LG 2002700/2002700

TYPE: IM
DATE: 3/18/75
AUTHOR: Welsh D.
RECIPIENT: Haas F. cc: Sloat A.

REQ NUMBER: 1 RFP 4, 34, 51
PRIVILEGE: WP; AC; JD

DESCRIPTION: Correspondence from Liggett executive Welsh to Liggett in-house counsel Haas (copy to Liggett executive) concerning legal advice provided relating to CTR Special Projects research to be undertaken by Liggett and other cigarette manufacturers to assist in the joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 16939
MINN NUMBERS: LG 2002701/2002701

TYPE: IM
DATE: 3/19/75
AUTHOR: Haas F.
RECIPIENT: Welsh D.

REQ NUMBER: 1 RFP 4, 34, 51
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel Haas to Liggett executive Welsh concerning legal advice provided relating to CTR Special Projects research to be undertaken by Liggett and other cigarette manufacturers to assist in the joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0

MINN NUMBERS: LG 2002704/2002704

TYPE: LT
DATE: 4/16/76
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Bryant H.
Greer J.
Hetsko C.
Roemer H.
Stevens A. cc: haas F.
Holtzman A.
Pepples E.
Pollack L.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Communication from attorney Hoel, outside
litigation attorney for Liggett and other
cigarette manufacturers, to his clients in-house
counsel for the cigarette manufacturers,
rendering advice within a joint defense of
pending or anticipated litigation, concerning
decisions with respect to funding of CTR Special
Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135862
MINN NUMBERS: LG 2002705/2002705

TYPE: IM
DATE: 5/16/77
AUTHOR: Greer J.
RECIPIENT: Dey K. cc: Hooker

REQ NUMBER: 1 RFP 4, 34, 37, 130
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Greer, in-house general
counsel of Liggett, to his client, chief
executive of Liggett, providing legal advice
concerning joint defense of pending or

anticipated litigation regarding CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135860
MINN NUMBERS: LG 2002706/2002706

TYPE: IM
DATE: 5/23/77
AUTHOR: Mold J.
RECIPIENT: Greer J. cc: Kersey R.

REQ NUMBER: 1 RFP 4, 37, 133
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Liggett research director Mold
to Liggett in-house counsel Greer seeking legal
advice and the thoughts and mental impressions
of industry counsel regarding decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135732
MINN NUMBERS: LG 2002707/2002708

TYPE: LT
DATE: 2/17/78

AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135739
MINN NUMBERS: LG 2002709/2002709

TYPE: LT
DATE: 3/24/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Greer J.
Henson A.
Pepples E.
Roemer H.
Stevens A. cc: Bryant
D.
Crohn M.
Holtzman A.
Pollack L.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other

outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135485
MINN NUMBERS: LG 2002710/2002710

TYPE: LT
DATE: 10/3/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld
Greer J.
Henson A.
Pepples E.
Roemer A.
Stevens A. cc: Bryant
Crohn
Holtzman
Pollack
Brown J. Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135375
MINN NUMBERS: LG 2002711/2002711

TYPE: LT
DATE: 4/4/79
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld

Crohn
Greer
Henson
Pepples
Stevens
Bryant
Holtzman
Pollack
Brown
Jacob

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation attorney for Ligget and other cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers, as well as to other outside litigation counsel for certain cigarette manufacturers, rendering advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135104
MINN NUMBERS: LG 2002712/2002713

TYPE: LT
DATE: 9/4/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Bryant
D.
Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135103
MINN NUMBERS: LG 2002714/2002714

TYPE: LT
DATE: 9/17/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.

Stevens A. cc: Bryant
D.
Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135099
MINN NUMBERS: LG 2002715/2002715

TYPE: LT
DATE: 10/24/79
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc:
Holtzman A.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other

outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135060
MINN NUMBERS: LG 2002716/2002717

TYPE: LT
DATE: 11/7/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensflod T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc:
Holtzman A.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135037
MINN NUMBERS: LG 2002718/2002719

TYPE: LT
DATE: 1/14/80
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135008
MINN NUMBERS: LG 2002720/2002721

TYPE: LT
DATE: 2/27/80

AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc:
Holtzman A.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135007
MINN NUMBERS: LG 2002722/2002722

TYPE: LT
DATE: 3/7/80
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples A.
Stevens A. cc: Haas F.
Holtzman A.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37

PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93557
MINN NUMBERS: LG 2002723/2002723

TYPE: LT
DATE: 3/24/80
AUTHOR: Finnegan T.
RECIPIENT: Ahrensflod
Crohn
Greer
Henson
Pepples
Stevens cc: Brown J.
Shinn W.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134932
MINN NUMBERS: LG 2002724/2002724

TYPE: LT
DATE: 4/23/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Finnegan T.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134926
MINN NUMBERS: LG 2002725/2002726

TYPE: LT
DATE: 4/28/80
AUTHOR: Hoel D.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc:
Holtzman A.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134922
MINN NUMBERS: LG 2002727/2002728

TYPE: LT
DATE: 6/5/80
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134849
MINN NUMBERS: LG 2002729/2002729

TYPE: LT

DATE: 7/2/80

AUTHOR: Hardy D.

RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134846

MINN NUMBERS: LG 2002730/2002731

TYPE: LT

DATE: 7/17/80

AUTHOR: Northrip R.

RECIPIENT: Ahrensfeld T.

Crohn M.

Greer J.

Henson A.

Pepples E.

Stevens A. cc:

Holtzman A.

Brown J.

Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Northrip, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C

CATEGORY:

SUBJ 1; 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134616
MINN NUMBERS: LG 2002732/2002733

TYPE: LT
DATE: 2/16/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93443
MINN NUMBERS: LG 2002734/2002735

TYPE: LT
DATE: 3/21/81
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.

Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93425
MINN NUMBERS: LG 2002736/2002736

TYPE: LT
DATE: 6/29/81
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers to in-house counsel for the cigarette manufacturers and certain outside counsel for cigarette manufacturers providing legal advice concerning decisions made within a joint defense of pending or anticipated

litigation, respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93426
MINN NUMBERS: LG 2002737/2002738

TYPE: LT
DATE: 7/7/81
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
litigation counsel for certain cigarette
manufacturers to in-house counsel for the
cigarette manufacturers and certain outside
counsel for cigarette manufacturers providing
legal advice concerning decisions made within a
joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93189
MINN NUMBERS: LG 2002739/2002740

TYPE: LT
DATE: 10/28/81
AUTHOR: Finnegan T.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and other outside
counsel for certain cigarette manufacturers,
providing legal advice concerning decisions made
within a joint defense of pending or anticipated
litigation, respecting funding of CTR Special
Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134494
MINN NUMBERS: LG 2002741/2002742

TYPE: LT
DATE: 1/21/82
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.

Henson A.
Pepples E.
Stevens A. cc: Brown J.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93389
MINN NUMBERS: LG 2002743/2002744

TYPE: LT
DATE: 2/15/82
AUTHOR: Finnegan T.
RECIPIENT: Greer
Henson
Holtzman
Pepples
Stevens
Witt
cc: Brown J.
Sirridge P.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside
litigation counsel for certain cigarette
manufacturers, to in-house counsel for the
cigarette manufacturers and other outside
counsel for certain cigarette manufacturers,

providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134340
MINN NUMBERS: LG 2002745/2002746

TYPE: LT
DATE: 2/19/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
cc: Brown J.
cc: Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134429
MINN NUMBERS: LG 2002747/2002747

TYPE: LT
DATE: 2/19/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of scientific research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134310
MINN NUMBERS: LG 2002748/2002749

TYPE: LT
DATE: 2/26/82
AUTHOR: Hardy D.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134236
MINN NUMBERS: LG 2002750/2002752

TYPE: LT
DATE: 3/1/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel

for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134228
MINN NUMBERS: LG 2002753/2002753

TYPE: LT
DATE: 4/5/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134217
MINN NUMBERS: LG 2002754/2002755

TYPE: LT
DATE: 5/5/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134155
MINN NUMBERS: LG 2002756/2002757

TYPE: LT
DATE: 6/8/82
AUTHOR: Sirridge P.

RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
cc: Brown J.
cc: Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
litigation counsel for certain cigarette
manufacturers, to his clients, in-house counsel
for the cigarette manufacturers and other
outside counsel for certain cigarette
manufacturers, providing legal advice concerning
decisions made within a joint defense of pending
or anticipated litigation, respecting funding of
research proposal.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134151
MINN NUMBERS: LG 2002759/2002759

TYPE: LT
DATE: 7/1/82
AUTHOR: Hoel D.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
cc: Brown J.
cc: Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
litigation attorney for certain cigarette

manufacturers, to his clients in-house counsel for the cigarette manufacturers, rendering legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93224
MINN NUMBERS: LG 2002760/2002761

TYPE: IM
DATE: 8/12/82
AUTHOR: Finnegan T.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt J. Brown J.
Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of joint industry funded research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134106
MINN NUMBERS: LG 2002762/2002763

TYPE: LT
DATE: 1/7/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
cc: Brown J.
cc: Jacob E.

REQ NUMBER: 1 RFP 4, 32, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 136294
MINN NUMBERS: LG 2002764/2002764

TYPE: LT
DATE: 8/15/73
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.

Bryant D.
Haas F.
Roemer H.
Stevens A.
cc: Holtzman A.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside litigation counsel for certain cigarette manufacturers, to his clients, in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2003350/2003415

TYPE: RP
DATE: 1/26/94
AUTHOR: Covington & Burling
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Draft report by Covington & Burling, outside counsel for Liggett and certain cigarette manufacturers, providing legal advice and the thoughts and mental impressions of counsel regarding DHHS ingredients disclosure and potential legislative hearings concerning cigarette ingredients within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5; 6; 10
CATEGORY:
DOCUMENT LOCATION: 6

LIG NUMBERS: 36911
MINN NUMBERS: LG 2004131/2004133

TYPE: IM
DATE: 9/28/64
AUTHOR: Haas F.
RECIPIENT: Horan F.
Provost

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett counsel Haas to
Liggett in-house counsel Horan and Liggett
executive Provost providing legal advice and the
thoughts and impressions of counsel regarding
pending legislative hearings concerning health
warning notices within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 37505
MINN NUMBERS: LG 2004165/2004165

TYPE: LT
DATE: 1/27/65
AUTHOR: Haas F.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4

PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Haas, outside
counsel for Liggett, to Liggett in-house counsel
Horan providing legal advice and the thoughts
and impressions of counsel regarding pending
legislative hearings concerning health warning
notices within a joint defense of pending or
anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 36369
MINN NUMBERS: LG 2004485/2004487

TYPE: IM
DATE: 9/11/67
AUTHOR: Littlefield B.
RECIPIENT: Yeaman A. cc: Burgard
J.
McCarty C.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from B&W executive
Littlefield to B&W in-house counsel Yeaman
providing information to assist in the rendition
of legal advice regarding advertising issues and
proposed government regulations, provided to
Liggett as part of the joint defense of pending
or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 36364
MINN NUMBERS: LG 2004525/2004525

TYPE: IM
DATE: 11/16/67
AUTHOR: Haas F.
RECIPIENT: White S. cc: Robinson
H.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executive White
providing legal advice and the thoughts and
impressions of counsel regarding advertising
issues and discussing legal advice and the
thoughts and impressions of attorney Yeaman and
attorney Ramm, counsel for certain cigarette
manufacturers, regarding same within a joint
defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 28135
MINN NUMBERS: LG 2004529/2004530

TYPE: IM
DATE: 11/21/67
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old J.
White S.

REQ NUMBER: 1 RFP 4,132
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executives Harrington,
Old and White providing legal advice and the
thoughts and impressions of counsel regarding

advertising issues and proposed government regulations concerning cigarette advertising and discussing legal advice and the thoughts and impressions provided by counsel for other cigarette manufacturers within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 36360
MINN NUMBERS: LG 2004537/2004539

TYPE: IM
DATE: 12/13/67
AUTHOR: Littlefield B.
RECIPIENT: Yeaman A.
Burgard J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from B&W executive to B&W in-house counsel Yeaman providing information requested by counsel to assist counsel in the rendition of legal advice regarding advertising issues and government regulations, provided to Liggett within joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 36372
MINN NUMBERS: LG 2004540/2004548

TYPE: IM
DATE: 12/15/67
AUTHOR: Littlefield B.
RECIPIENT: Yeaman A.
Burgard J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from B&W executive Littlefield to B&W in-house counsel Yeaman and B&W executive Burgard providing information requested by counsel to assist in the rendition of legal advice regarding advertising issues and government regulations, provided to Liggett within joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 36324
MINN NUMBERS: LG 2004550/2004551

TYPE: IM
DATE: 12/29/67
AUTHOR: Lincoln G.
RECIPIENT: Robinson H. cc: Haas F.

REQ NUMBER: 1 RFP 4, 98
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett executive Lincoln to Liggett executive Robinson discussing information requested by counsel for the rendition of legal advice regarding governmental regulation of advertising within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8

CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 21970
MINN NUMBERS: LG 2005123/2005299

TYPE: RP
DATE: 8/1/67
AUTHOR: Decker F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 28
PRIVILEGE: AC; JD
DESCRIPTION: Working draft prepared by attorney Decker,
outside counsel for Liggett, of response to HEW
Report to Congress on Smoking and Health
reflecting legal advice and thoughts and mental
impressions of counsel, and distributed to
counsel for other tobacco companies within a
joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 96568
MINN NUMBERS: LG 2005306/2005308

TYPE: LT
DATE: 7/21/78
AUTHOR: Pepples E.
RECIPIENT: Ahrensfield T.
Holtzman A.
Henson A.
Greer J.

Stevens A.
Crohn M.
Roemer A. cc: Temko S.
Jacob E.
Kornegay H.
Mills
Ehringhaus J.
Morgan
Brown J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from B& W in-house counsel
Pepples to Liggett in-house counsel Greer and
counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
mental impressions of counsel regarding pending
FTC warning notice and advertising subpoena
litigation and pending legislative hearings
concerning cigarette advertising and attaching
agenda for meeting of counsel reflecting the
same, within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 96582
MINN NUMBERS: LG 2005309/2005317

TYPE: NO
DATE: 5/25/78
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of Liggett in-house counsel Greer
reflecting the thoughts and mental impressions
and relating legal advice provided by counsel
for certain cigarette manufacturers regarding
pending FTC warning notice and advertising
subpoena litigation and pending legislative

hearings concerning cigarette advertising within
a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 96609
MINN NUMBERS: LG 2005318/2005320

TYPE: LT
DATE: 5/25/78
AUTHOR: Pepples E.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Pepples
to Liggett in-house counsel Greer, concerning
agenda of meeting of counsel for certain
cigarette manufacturers reflecting legal advice
and the thoughts and mental impressions of
counsel regarding pending FTC warning notice and
advertising subpoena litigation and pending
legislative hearings concerning cigarette
advertising within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 96702

MINN NUMBERS: LG 2005351/2005382

TYPE: LT
DATE: 3/28/78
AUTHOR: Temko S.
RECIPIENT: Committee of Counsel

cc: Brown J.
Ehringhaus J.
Henson A.
Holtzman A.
Jacob E.
Kornegay H.
Roemer H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Temko, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer, counsel for certain cigarette manufacturers and Tobacco Institute executive providing legal advice and the thoughts and mental impressions of counsel and enclosing draft correspondence reflecting the same regarding proposed FDA regulations concerning cigarette filters within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 6; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 96884
MINN NUMBERS: LG 2005471/2005473

TYPE: LT
DATE: 3/16/78
AUTHOR: Pepples E.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Pepples to Liggett in-house Greer concerning agenda for

meeting of counsel regarding pending FTC warning notice and advertising subpoena litigation, government hearings and scientific research and reflecting legal advice and the thoughts and mental impressions of counsel regarding same within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 5; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 96962
MINN NUMBERS: LG 2005509/2005510

TYPE: LT
DATE: 3/14/78
AUTHOR: Pepples E.
RECIPIENT: Ahrensfeld
Stevens
Greer
Crohn
Henson cc: Shinn W.

REQ NUMBER: 1 RFP 4, 37, 40
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from B&W in-house counsel Pepples to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers providing legal advice and the thoughts and mental impressions of counsel regarding FTC regulations concerning carbon monoxide testing within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 1; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 97018
MINN NUMBERS: LG 2005519/2005520

TYPE: LT
DATE: 12/27/77
AUTHOR: Pepples E.
RECIPIENT: Ahrensfeld

Crohn
Chapin
Greer
Henson
Holtzmanm
Roemer
Shinn
Stevens
Temko cc: Brown J.
Jacob E.
Northrip B.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence and enclosed agenda from B&W
in-house counsel Pepples to Liggett in-house
counsel Greer and counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and mental impressions of counsel
regarding FTC subpoena and scientific reseach
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 135853
MINN NUMBERS: LG 2005563/2005563

TYPE: LT
DATE: 7/14/77

AUTHOR: Kornegay H.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: JD
DESCRIPTION: Correspondence from Tobacco Institute executive
Kornegay to Liggett in-house counsel Greer
providing information to assist industry counsel
in the rendition of legal advice regarding a
research proposal within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 97275
MINN NUMBERS: LG 2005564/2005579

TYPE: IM
DATE: 7/21/77
AUTHOR: Provost D.
RECIPIENT: Mulligan R. cc: Dey K.
Hooker R.
Rechholtz B.
Greer J.
Robinson C.

REQ NUMBER: 1 RFP 4, 37, 130
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett executive
Provost to Liggett executive Mulligan (copies to
Liggett in-house counsel Greer and Liggett
executives Dey, Hooker, Rechholtz and Robinson)
relating legal advice and the thoughts and
mental impressions of industry counsel
concerning a proposed joint industry advertising
campaign and enclosed memoranda prepared by
attorney Austern, outside counsel for Liggett
and certain cigarette manufacturers regarding
pending FTC NCEN advertising litigation and
advertising issues within a joint defense of
pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 5; 8; 10

CATEGORY:

DOCUMENT LOCATION: 10

LIG NUMBERS: 97428

MINN NUMBERS: LG 2005618/2005628

TYPE: NO

DATE: 8/4/77

AUTHOR: Greer J.

RECIPIENT:

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting his thoughts and mental
impressions and relating legal advice provided
by industry counsel for certain cigarette
manufacturers regarding pending FTC warning
notice and advertising subpoena litigation, the
Toxic Substances Control Act and other joint
industry issues within a joint defense of
pending or anticipated litigation.

PRIV A; B; C;

CATEGORY:

SUBJ 4X; 7; 8; 10; 11

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 99802

MINN NUMBERS: LG 2005719/2005721

TYPE: NO

DATE: 10/3/73

AUTHOR: Greer J.

RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett In-house counsel
Greer concerning meeting of Committee of Counsel
reflecting legal advice and thoughts and mental
impressions of counsel for Liggett and in-house
and outside counsel for other cigarette
manufacturers regarding governmental regulations
of cigarettes and institutional grants research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99805
MINN NUMBERS: LG 2005722/2005724

TYPE: NO
DATE: 10/4/73
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer concerning meeting of Committee of Counsel
reflecting legal advice and thoughts and mental
impressions of counsel for Liggett and in-house
and outside counsel for other cigarette
manufacturers regarding a research proposal and
institutional grants research within a joint
defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99808
MINN NUMBERS: LG 2005725/2005732

TYPE: NO
DATE:
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4,37, 59
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer concerning meeting of the Executive
Committee of the Tobacco Institute, reflecting
legal advice and thoughts and mental impressions
of Greer and in-house and outside counsel for
other cigarette manufacturers concerning
governmental regulation, proposed legislation
concerning various joint industry issues and
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 110563
MINN NUMBERS: LG 2005733/2005733

TYPE: LT
DATE: 11/30/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation

counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110612
MINN NUMBERS: LG 2005734/2005734

TYPE: LT
DATE: 11/9/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110619
MINN NUMBERS: LG 2005735/2005735

TYPE: LT
DATE: 10/28/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110625
MINN NUMBERS: LG 2005736/2005736

TYPE: LT
DATE: 10/20/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110636
MINN NUMBERS: LG 2005737/2005737

TYPE: LT
DATE: 10/6/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110637
MINN NUMBERS: LG 2005738/2005738

TYPE: LT
DATE: 10/4/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for cigarette manufacturers enclosing
publicly available research materials compiled
at request of industry counsel to assist in
rendition of legal advice within a joint defense
of pending or anticipated smoking and health
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110652
MINN NUMBERS: LG 2005739/2005739

TYPE: LT
DATE: 9/15/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110660
MINN NUMBERS: LG 2005741/2005743

TYPE: LT
DATE: 8/19/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110663
MINN NUMBERS: LG 2005744/2005744

TYPE: LT
DATE: 8/12/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108347
MINN NUMBERS: LG 2005745/2005745

TYPE: LT
DATE: 12/27/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108348
MINN NUMBERS: LG 2005746/2005746

TYPE: LT
DATE: 12/15/55
AUTHOR: Clarke A.

RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108350
MINN NUMBERS: LG 2005747/2005747

TYPE: LT
DATE: 12/1/55
AUTHOR: Clarke A,
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108357
MINN NUMBERS: LG 2005748/2005748

TYPE: LT
DATE: 11/17/55
AUTHOR: Clarke A.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108380
MINN NUMBERS: LG 2005749/2005749

TYPE: LT
DATE: 11/8/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to

assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108381
MINN NUMBERS: LG 2005750/2005750

TYPE: LT
DATE: 11/7/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108382
MINN NUMBERS: LG 2005751/2005751

TYPE: LT
DATE: 10/28/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108383
MINN NUMBERS: LG 2005752/2005752

TYPE: LT
DATE: 10/28/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108384
MINN NUMBERS: LG 2005753/2005754

TYPE: LT
DATE: 10/6/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108386
MINN NUMBERS: LG 2005755/2005755

TYPE: LT
DATE: 9/27/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation

counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108388
MINN NUMBERS: LG 2005756/2005756

TYPE: LT
DATE: 9/22/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108389
MINN NUMBERS: LG 2005757/2005757

TYPE: LT
DATE: 9/20/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108397
MINN NUMBERS: LG 2005758/2005758

TYPE: LT
DATE: 8/16/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108398
MINN NUMBERS: LG 2005759/2005759

TYPE: LT
DATE: 8/16/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108399
MINN NUMBERS: LG 2005760/2005760

TYPE: LT
DATE: 8/10/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for cigarette manufacturers enclosing
publicly available research materials compiled
at request of industry counsel to assist in
rendition of legal advice within a joint defense
of pending or anticipated smoking and health
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108402
MINN NUMBERS: LG 2005762/2005762

TYPE: LT
DATE: 8/3/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108403
MINN NUMBERS: LG 2005763/2005763

TYPE: LT
DATE: 8/1/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108404
MINN NUMBERS: LG 2005764/2005764

TYPE: LT
DATE: 8/1/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108405
MINN NUMBERS: LG 2005765/2005765

TYPE: LT
DATE: 8/1/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108406
MINN NUMBERS: LG 2005766/2005766

TYPE: LT
DATE: 8/1/55
AUTHOR: Clarke A.

RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108461
MINN NUMBERS: LG 2005767/2005767

TYPE: LT
DATE: 7/5/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108463
MINN NUMBERS: LG 2005768/2005768

TYPE: LT
DATE: 6/24/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108470
MINN NUMBERS: LG 2005769/2005769

TYPE: LT
DATE: 6/13/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to

assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108471
MINN NUMBERS: LG 2005770/2005770

TYPE: LT
DATE: 6/13/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108482
MINN NUMBERS: LG 2005771/2005772

TYPE: LT
DATE: 6/8/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108494
MINN NUMBERS: LG 2005774/2005774

TYPE: LT
DATE: 5/25/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108493
MINN NUMBERS: LG 2005775/2005775

TYPE: LT
DATE: 5/25/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108498
MINN NUMBERS: LG 2005776/2005776

TYPE: LT
DATE: 5/10/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation

counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108499
MINN NUMBERS: LG 2005777/2005778

TYPE: LT
DATE: 4/28/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108502
MINN NUMBERS: LG 2005780/2005780

TYPE: LT
DATE: 4/13/55
AUTHOR: Hitchcock H.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett outside litigation
counsel Hitchcock to Liggett in-house counsel
Horan discussing research materials compiled at
the request of industry counsel to assist in
rendition of legal advice regarding pending
smoking and health litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108503
MINN NUMBERS: LG 2005781/2005781

TYPE: LT
DATE: 4/19/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108504
MINN NUMBERS: LG 2005782/2005783

TYPE: LT
DATE: 3/25/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108506
MINN NUMBERS: LG 2005784/2005784

TYPE: LT
DATE: 3/24/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant

Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108507
MINN NUMBERS: LG 2005785/2005785

TYPE: LT
DATE: 3/22/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108511
MINN NUMBERS: LG 2005786/2005786

TYPE: LT
DATE: 3/14/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108512
MINN NUMBERS: LG 2005787/2005787

TYPE: LT
DATE: 3/11/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108517
MINN NUMBERS: LG 2005788/2005788

TYPE: LT
DATE: 2/28/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108518
MINN NUMBERS: LG 2005789/2005789

TYPE: LT
DATE: 2/18/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108519
MINN NUMBERS: LG 2005790/2005790

TYPE: LT
DATE: 2/16/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108523
MINN NUMBERS: LG 2005792/2005793

TYPE: LT
DATE: 1/25/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108525
MINN NUMBERS: LG 2005794/2005796

TYPE: LT
DATE: 1/28/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in rendition of legal advice within a
joint defense of pending or anticipated smoking

and health litigation.
PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108178
MINN NUMBERS: LG 2005801/2005801

TYPE: LT
DATE: 10/23/56
AUTHOR: Clarke A.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to Liggett in-house counsel Horan
concerning Clarke's compilation of publicly
available research materials compiled at request
of industry counsel to assist in the rendition
of legal advice within a joint defense of
pending or anticipated smoking and health
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108179
MINN NUMBERS: LG 2005802/2005802

TYPE: LT
DATE: 10/23/56

AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to Liggett in-house counsel Horan
concerning Clarke's compilation of publicly
available research materials compiled at request
of industry counsel to assist in the rendition
of legal advice within a joint defense of
pending or anticipated smoking and health
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108537
MINN NUMBERS: LG 2005803/2005803

TYPE: LT
DATE: 1/7/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108538
MINN NUMBERS: LG 2005804/2005804

TYPE: LT
DATE: 1/7/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108539
MINN NUMBERS: LG 2005805/2005805

TYPE: LT
DATE: 1/4/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials

compiled at request of industry counsel to assist in the rendition of legal advice within a joint defense of pending or anticipated smoking and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108213
MINN NUMBERS: LG 2005806/2005806

TYPE: LT
DATE: 7/2/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108220
MINN NUMBERS: LG 2005807/2005809

TYPE: LT
DATE: 6/18/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108224
MINN NUMBERS: LG 2005810/2005810

TYPE: LT
DATE: 6/1/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108339
MINN NUMBERS: LG 2005811/2005811

TYPE: LT
DATE: 1/9/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108340
MINN NUMBERS: LG 2005812/2005812

TYPE: LT
DATE: 1/6/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant

Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108265
MINN NUMBERS: LG 2005813/2005813

TYPE: LT
DATE: 5/7/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108286
MINN NUMBERS: LG 2005814/2005814

TYPE: LT
DATE: 4/17/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108332
MINN NUMBERS: LG 2005815/2005815

TYPE: LT
DATE: 2/10/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from R.J. Reynolds consultant
Clarke to in-house and outside litigation
counsel for certain cigarette manufacturers
enclosing publicly available research materials
compiled at request of industry counsel to
assist in the rendition of legal advice within a
joint defense of pending or anticipated smoking
and health litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 93149
MINN NUMBERS: LG 2006022/2006023

TYPE: LT
DATE: 7/15/82
AUTHOR: Wrobleski C.
RECIPIENT: Greer

Stevens
Henson
Pebbles
Holtzman
Witt
cc: Brown J.
Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Wrobleski to Liggett
in-house counsel Greer and counsel for cigarette
manufacturers (copies to attorney Brown and
attorney Shinn, counsel for certain cigarette
manufacturers) providing legal advice and the
thoughts and mental impressions of industry
counsel regarding joint industry funded research
to assist counsel in the rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 5
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93151
MINN NUMBERS: LG 2006024/2006028

TYPE: LT
DATE: 2/2/82
AUTHOR: Finnegan T.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for
certain cigarette manufacturers (copies to
attorneys Brown and Sirridge, outside counsel
for certain cigarette manufacturers) providing
legal advice and thoughts and mental impressions
of industry counsel concerning joint industry
funded research to assist counsel in the
rendition of legal advice within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 5
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93222
MINN NUMBERS: LG 2006030/2006030

TYPE: LT
DATE: 8/3/82
AUTHOR: Stevens A.
RECIPIENT: Wroblewski C. cc: Greer
J.
Henson A.
Holtzman A.
Pepples E.
Witt S.

Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, Lorillard
in-house counsel, to attorney Wroblewski, outside
counsel for certain cigarette manufacturers
(copies to Liggett in-house counsel Greer and
counsel for certain cigarette manufacturers)
regarding joint industry funded research to
assist counsel in the rendition of legal advice
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93447
MINN NUMBERS: LG 2006048/2006050

TYPE: LT
DATE: 2/22/80
AUTHOR: Stevens A.
RECIPIENT: Finnegan T.
cc: Ahrensfield T.
Holtzman A.
Crohn M.
Greer J.
Henson A.
Pepples E.
Shinn W.
Jacob E.
Brown J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
counsel for Lorillard to outside counsel
Finnegan (copies to Liggett in-house counsel
Greer and counsel for certain cigarette
manufacturers) concerning joint industry funded
research to assist counsel in the rendition of
legal advice, within a joint defense of pending

or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 114896
MINN NUMBERS: LG 2006094/2006111

TYPE: LT
DATE: 5/24/83
AUTHOR: Carlton J.
RECIPIENT: Chilcote S. cc:
Ainsworth G.
Nielsen C.
Haley M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Carlton (Spruill,
Lane), outside counsel for the Tobacco
Institute, to Tobacco Institute executive
Chilcote providing legal advice and thoughts and
mental impressions of industry counsel regarding
lobbying issues, distributed within a joint
defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 115542
MINN NUMBERS: LG 2006112/2006113

TYPE: LT
DATE: 11/23/77
AUTHOR: Pepples E.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson C.
Holtzman A.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Pepples, in-house
counsel for B&W, to Liggett in-house counsel
Greer and counsel for certain cigarette
manufacturers, providing legal advice and the
thoughts and impressions of industry counsel
regarding draft letter concerning industry
response to a speech concerning smoking and
health research within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 125483
MINN NUMBERS: LG 2006126/2006129

TYPE: IM
DATE: 11/23/77
AUTHOR: Greer J.
RECIPIENT: Africk J. cc: Hooker R.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Greer to Liggett executive Africk
seeking assistance and reflecting legal advice
provided by industry counsel for certain
cigarette manufacturers regarding enclosed draft
industry response to a speech concerning smoking
and health research within a joint defense of

pending or anticipated litigation.
PRIV A
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 93455
MINN NUMBERS: LG 2006152/2006155

TYPE: LT
DATE: 2/2/82
AUTHOR: Finnegan T.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt
Brown J.
Sirr ridge P.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Finnegan, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for
certain cigarette manufacturers (copies to
attorneys Brown and SIRRIDGE, outside counsel
for certain cigarette manufacturers) providing
legal advice and thoughts and mental impressions
of industry counsel concerning joint industry
funded research to assist counsel in the
rendition of legal advice, within a joint
defense of pending or anticipated litigation,
with marginalia of attorney Greer.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 5
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 34415
MINN NUMBERS: LG 2006156/2006158

TYPE: LT
DATE: 1/13/68
AUTHOR: Shinn W.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding joint
industry funded research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 34433
MINN NUMBERS: LG 2006159/2006164

TYPE: LT
DATE: 1/13/68
AUTHOR: Shinn W.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from attorney Shinn, outside counsel
for Liggett and certain cigarette manufacturers,
to Liggett in-house counsel Haas and counsel for
certain cigarette manufacturers providing legal
advice and the thoughts and impressions of
industry counsel regarding joint industry funded
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 34427
MINN NUMBERS: LG 2006165/2006167

TYPE: LT
DATE: 1/11/68
AUTHOR: Shinn W.
RECIPIENT: Haas F.
Hetsko C.
Ramm H.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding joint
industry funded research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2006229/2006230

TYPE: IM
DATE: 12/11/63
AUTHOR: Haas F.
RECIPIENT: Files

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Horan to his files reflecting the
thoughts and impressions of counsel regarding
public statements concerning scientific research
and advertising issues, and reflecting legal
advice of industry counsel for other cigarette
manufacturers, within a joint defense of pending
or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8; 10;
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2006231/2006234

TYPE: IM
DATE: 9/25/63
AUTHOR: Bartels J.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from attorney Bartels,
outside counsel for Liggett, to Liggett in-house

counsel Horan providing legal advice and relating legal advice of industry counsel for certain cigarette manufacturers regarding the Surgeon General's report within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2006235/2006240

TYPE: IM
DATE: 9/3/63
AUTHOR: Haas F.
RECIPIENT: Files

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from attorney Haas, outside counsel for Liggett, to his files reflecting the legal advice and thoughts and impressions of industry counsel and counsel for cigarette manufacturers, regarding the Surgeon General's Report and smoking and health litigation, legislative hearings and FTC hearings related to a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006254/2006254

TYPE: LT
DATE: 12/1/69
AUTHOR: Hardy D.
RECIPIENT: Brown J.
Carroll K.
Cohn D.
Cooke E.
Crohn M.
Decker F.
Holtzman A.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, to attorney Decker, outside
counsel for Liggett, and counsel for certain
cigarette manufacturers providing legal advice
and the thoughts and impressions of industry
counsel regarding a government publication
concerning emphysema within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006260/2006265

TYPE: LT
DATE: 8/15/67
AUTHOR: Hardy D.
RECIPIENT: Brown J.
Cohn D.
Cooke E.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Hardy, outside counsel for Liggett and certain cigarette manufacturers, to attorney Cohn, outside counsel for Liggett, and other outside counsel for certain cigarette manufacturers, providing legal advice and thoughts and impressions of industry counsel, and enclosing draft correspondence regarding government hearings concerning cigarette labeling reflecting the same, distributed within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2006268/2006269

TYPE: LT
DATE: 5/17/67
AUTHOR: Clements E.
RECIPIENT: Decker F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: JD
DESCRIPTION: Correspondence from Tobacco Institute executive Clements to attorney Decker, outside counsel for Liggett, providing information to assist industry counsel in the rendition of legal advice regarding government hearings concerning cigarette labeling distributed within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006279/2006285

TYPE: LT
DATE: 3/5/65
AUTHOR: Bates W.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Liggett research director
Bates to attorney Haas, outside counsel for
Liggett, providing information and enclosing
draft memorandum to assist industry counsel in
the rendition of legal advice regarding pending
legislative hearings concerning cigarette
labeling.

PRIV A
CATEGORY:

SUBJ 3; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006299/2006304

TYPE: LT
DATE: 12/23/64
AUTHOR: Hetsko C.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from at in-house counsel Hetsko
to attorney Haas, outside counsel for Liggett
and counsel for certain cigarette manufacturers,
providing information and enclosed memorandum
regarding governmental regulations of smoking,
prepared to assist counsel in the rendition of
legal advice, distributed within a joint defense
of pending or anticipated litigation concerning

pending legislative hearings regarding cigarette labeling.

PRIV A; C
CATEGORY:

SUBJ 3; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006311/2006312

TYPE: LT
DATE: 8/21/64
AUTHOR: Thompson C.
RECIPIENT: Hardy D. cc: Brown J.

Cooke E.
Haas F.
Holtzman A.
Jacobs E.
Russell J.
Temko S.
Allen G.
DeHart E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hill & Knowlton executive to attorney Hardy, outside counsel for Liggett and certain cigarette manufacturers (copies to attorney Haas, outside counsel for Liggett and counsel for certain cigarette manufacturers) providing information to industry assist counsel in the rendition of legal advice regarding preparation for government hearings concerning cigarette labeling distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006318/2006330

TYPE: LT
DATE: 5/23/64
AUTHOR: Krash A.
RECIPIENT: Ramm

Hetsko
Haas
Russell
Smith
Yeaman
Austern
Wald

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Krash, outside
counsel for Philip Morris, to attorney Haas,
outside counsel for Liggett, and counsel for
certain cigarette manufactures, providing legal
advice and thoughts and impressions of Krash and
attorneys Dym, Ross and Sobol, and enclosing
memorandum prepared by counsel reflecting legal
advice and to assist industry counsel in the
rendition of industry legal advice, regarding
pending legislative hearings concerning
cigarette labeling.

PRIV A; B; C
CATEGORY:

SUBJ 1; 9; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006352/2006357

TYPE: NO
DATE: 1/1/64

AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas reflecting the thoughts and impressions of
counsel regarding a meeting with industry
counsel for certain cigarette manufacturers
regarding the Surgeon General's report within a
joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:

SUBJ 5, 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006358/2006359

TYPE: IM
DATE: 9/16/64
AUTHOR: Haas F.
RECIPIENT: Horan F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from attorney Haas, outside
counsel for Liggett, to Liggett in-house counsel
Horan providing legal advice and thoughts and
mental impressions of industry counsel and
relating legal advice provided by industry
counsel for certain cigarette manufacturers
regarding pending litigation and advertising
issues, within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 5;

LIG NUMBERS: 0
MINN NUMBERS: LG 2006720/2006779

TYPE: LT
DATE: 7/25/67
AUTHOR: Shinn W.
RECIPIENT: Brown J.
Carroll K.
Cohn D.
Cooke E.
Decker F.
Holtzman A.
Jacobs E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to attorney Decker, outside
counsel for Liggett and counsel for certain
cigarette manufacturers, enclosing memorandum
reflecting legal advice and the thoughts and
mental impressions of industry counsel,
regarding industry response to FTC's Annual
Report to Congress on Cigarette Advertising
distributed within a joint defense of pending or
anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2006785/2006807

TYPE: LT
DATE: 3/9/64

AUTHOR: Austern T.
RECIPIENT: Special Legal Committee

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Austern, outside counsel for Liggett and certain other cigarette manufacturers, to members of the Special Legal Committee, providing legal advice and enclosing draft industry response to issuance of the Report of the Advisory Committee to the Surgeon General to be submitted to the FTC reflecting the same distributed within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2006808/2006836

TYPE: LT
DATE: 2/24/64
AUTHOR: Austern T.
RECIPIENT: Special Legal Committee

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Austern, outside counsel for Liggett and certain other cigarette manufacturers, to members of the Special Legal Committee, providing legal advice and enclosing draft industry response to issuance of the Report of the Advisory Committee to the Surgeon General to be submitted to the FTC reflecting the same distributed within a joint defense of pending or anticipated litigation, with handwritten notes of Haas regarding the same.

PRIV A
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:

DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2007351/2007353

TYPE: LT
DATE: 5/6/67
AUTHOR: Austern T.
RECIPIENT: Clements E. cc: Haas
Hetsko
Ramm
Smith
Yeaman

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Austern, outside
counsel for Liggett and certain cigarette
manufacturers, to Tobacco Institute executive
Clements (copies to counsel of certain cigarette
manufacturers) reflecting legal advice and
thoughts and mental impressions of industry
counsel regarding operations of the Tobacco
Institute distributed within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2007623/2007658

TYPE: LT
DATE: 02/21/68
AUTHOR: Cooke E.

RECIPIENT: Brown J; Carrol K.;
Cohn D.; Decker F.;
Hardy D.; Hoel D.;
Holtzman A.; Jacob E.;
Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from attorney Cooke, outside counsel
for certain cigarette manufacturers, to counsel
for certin cigarette manufacturers reflecting
legal advice and thoughts and mental impressions
of counsel regarding statements to congress
regarding smoking and health issues and
advertising of cigarettes distributed within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 93661
MINN NUMBERS: LG 2007975/2007975

TYPE: LT
DATE: 11/20/79
AUTHOR: Jacob E.
RECIPIENT: Ahrensfeld, Crohn,
Greer, Henson,
Pepples, Stevens
cc: Shinn W.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers to
in-house counsel for cigarette manufacturers
(copy to outside counsel for certain cigarette
manufacturers) reflecting legal advice and
thoughts and mental impressions concerning joint
industry funded research for use in assisting
counsel in rendition of legal advice, within a
joint defense of pending or anticipated

litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93664
MINN NUMBERS: LG 2007976/2007977

TYPE: NO
DATE: 2/16/72
AUTHOR: Morgenthaler C.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of Liggett in-house attorney Morgenthaler concerning expenses incurred by Liggett for retention of joint industry consultants to assist counsel in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2008073/2008073

TYPE: IM
DATE: 2/3/78
AUTHOR: Greer J.
RECIPIENT: Dey K. cc: Africk J.

Currin W.
Hilliard R.
Hooker R.
Kersey R.
Mann
Mold J.
Robinson H.

REQ NUMBER: 1 RFP 4, 130, 132, 134
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Dey (copies to Liggett executives
Africk, Currin, Hooker, Huckabee, Kersey, Mann
and Robinson and Liggett researchers Hilliard
and Mold) providing legal advice and the
thoughts and impressions of counsel regarding
FTC carbon monoxide testing.
PRIV A
CATEGORY:
SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 121402
MINN NUMBERS: LG 2008117/2008118

TYPE: LT
DATE: 6/17/82
AUTHOR: Hoel D.
RECIPIENT: Greer J.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding a
proposed research conference concerning ETS
exposure within a joint defense of pending or

DATE: 5/8/64
AUTHOR: Haas F.
RECIPIENT: Toms Z.
Harrington M.
Horan F.

REQ NUMBER: 1 RFP 4, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from attorney Haas, outside
counsel for Liggett, to Liggett in-house counsel
Horan and Liggett executives Harrington and Toms
providing legal advice and the thoughts and
impressions of industry counsel regarding
pending legislative hearings concerning
cigarette labeling and relating legal advice
provided by counsel for certain cigarette
manufacturers, within a joint defense of pending
or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 111118
MINN NUMBERS: LG 2008157/2008164

TYPE: IM
DATE: 1/23/64
AUTHOR: Haas F.
RECIPIENT: Toms Z.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum prepared by attorney Haas,
outside counsel for Liggett, to Liggett
executive Toms providing legal advice and the
thoughts and impressions of industry counsel
regarding proposed NAB advertising regulations,
proposed FTC regulations and hearings concerning
cigarette labeling and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding the same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 1; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 111126
MINN NUMBERS: LG 2008203/2008210

TYPE: IM
DATE: 1/13/64
AUTHOR: Haas F.
RECIPIENT: Toms Z.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from attorney Haas, outside
counsel for Liggett, to Liggett in-house counsel
Horan and Liggett executive Toms providing legal
advice and the thoughts and impressions of
industry counsel regarding the Surgeon General's
Report and proposed legislation concerning
labeling and advertising and smoking and health
litigation and relating legal advice provided by
counsel for certain cigarette manufacturers
reflecting the same within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 1; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 106191
MINN NUMBERS: LG 2008241/2008242

TYPE: LT

DATE: 10/13/80
AUTHOR: Ahrensfeld T.
RECIPIENT: Austern T.
Chapin J.
Crohn M.
Greer J.
Henson A.
Pepples E.
Shinn W.
Stevens A.
Temko S. cc: Kornegay
H.
Ehringhaus J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Philip Morris in-house
counsel Ahrensfeld to Liggett in-house counsel
Greer, attorneys Austern, Shinn and Temko,
outside counsel for Liggett and certain
cigarette manufacturers, and counsel for certain
cigarette manufacturers (copies to Tobacco
Institute executive and in-house counsel)
reflecting legal advice and the thoughts and
impressions of industry counsel regarding an
upcoming joint industry meeting concerning
various joint industry issues including pending
asbestos litigation and legislative hearings.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99423
MINN NUMBERS: LG 2008243/2008247

TYPE: NO
DATE: 6/23/81
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel

Greer reflecting legal advice and the thoughts and impressions of industry counsel regarding various joint industry issues including pending FTC warning notice litigation and the FTC Annual Report to Congress on Cigarette Advertising and relating legal advice provided by counsel for certain cigarette manufacturers regarding the same within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 95459
MINN NUMBERS: LG 2008248/2008255

TYPE: NO
DATE: 9/23/81
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting legal advice and the thoughts and impressions of industry counsel regarding draft industry response to FTC report concerning cigarette advertising issues and regarding DHHS ingredients disclosure and relating legal advice provided by counsel for certain cigarette manufacturers regarding the same within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4X; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 100291
MINN NUMBERS: LG 2008256/2008262

TYPE: NO
DATE: 5/25/82
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer reflecting legal advice and the thoughts
and impressions of industry counsel regarding
various joint industry issues including the
Tobacco Industry Advertising Code, DHHS
ingredients disclosure, proposed public smoking
legislation, CTR Special Projects research and
activities of the FTC concerning tar and
nicotine testing and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding the same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 301163
MINN NUMBERS: LG 2008306/2008307

TYPE: LT
DATE: 4/6/83
AUTHOR: Kelly J.
RECIPIENT: Witt S. cc: Chilcote S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Letter prepared by Tobacco Institute executive
to RJR general counsel reflecting legal advice
and thoughts and mental impressions of the

Committee of Counsel regarding legal strategy of industry regarding state ordinances relating to sampling distributed within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 4X; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 131601
MINN NUMBERS: LG 2008328/2008328

TYPE: LT
DATE: 1/16/78
AUTHOR: Kastenbaum M.
RECIPIENT: Temko S. cc: Jacob E.
Ehringhaus J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Tobacco Institute executive Kastenbaum to attorney Temko, outside counsel for Liggett and certain cigarette manufacturers (copies to attorneys Jacob and Ehringhaus, counsel for certain cigarette manufacturers), providing information requested by attorney Jacob to assist industry counsel in the rendition of legal advice regarding an article concerning smoking and oral contraceptives, distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 131603
MINN NUMBERS: LG 2008330/2008337

TYPE: LT
DATE: 8/4/77
AUTHOR: Kastenbaum M.
RECIPIENT: Jacob E.
cc:Kornegay H.
Roemer H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Tobacco Institute executive
Kastenbaum to attorney Jacob, outside counsel
for certain cigarette manufacturers (copies to
attorney Roemer and Tobacco Institute executive
Kornegay), providing information and enclosed
analysis requested by attorney Jacob to assist
industry counsel in the rendition of legal
advice regarding an article concerning smoking
and oral contraceptives, distributed within a
joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 133103
MINN NUMBERS: LG 2008417/2008419

TYPE: LT
DATE: 9/15/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield, T.
Greer, J.
Hetsko, C.
Pepples, E.
Roemer, H.
Stevens, A.
Bryant, D.
Chapin, J.

Crohn, Jr., M.
Holtzman, A.
Kornegay, H.
Pollack, L.
Brown, J.
Jacob, E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding
institutional grants research and enclosing
draft memorandum regarding same prepared within
a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 34529
MINN NUMBERS: LG 2008515/2008515

TYPE: LT
DATE: 10/23/67
AUTHOR: Ramm H.
RECIPIENT: Hardy D. cc: Clements
E.
Austern T.
Haas F.
Hetsko C.
Smith P.
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from RJR in-house counsel Ramm to
attorney Hardy, outside counsel for Liggett and
certain cigarette manufacturers, (copies to
Liggett in-house counsel Haas and counsel for

certain cigarette manufacturers and Tobacco Institute executive) reflecting legal advice and providing information to assist industry counsel in the rendition of legal advice regarding joint industry research in response to the Morbidity Study of the HEW within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 25293
MINN NUMBERS: LG 2008555/2008555

TYPE: LT
DATE: 1/13/73
AUTHOR: Bates W.
RECIPIENT: Haas F. cc: McAllister
K.

REQ NUMBER: 1 RFP 4, 128
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett research director Bates to Liggett in-house counsel Haas (copy to Liggett executive McAllister) providing information to assist counsel in the rendition of legal advice and discussing legal advice provided by attorney Hardy, outside counsel for Liggett and certain cigarette manufacturers, regarding institutional grants research, within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 121452
MINN NUMBERS: LG 2008841/2008844

TYPE: DR
DATE: 10/28/84
AUTHOR: Chadbourne & Park
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum prepared by Chadbourne & Park,
outside counsel for certain cigarette
manufacturers, to counsel for certain cigarette
manufacturers reflecting legal advice and the
thoughts and impressions of industry counsel
regarding a joint industry position paper
concerning addiction within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 122987
MINN NUMBERS: LG 2008881/2008881

TYPE: LT
DATE: 5/16/67
AUTHOR: Yeaman A.
RECIPIENT: Haas F.

Hetsko C.
Ramm A.
Smith A.
Clements E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Yeaman
to Liggett in-house counsel Haas and counsel for
certain cigarette manufacturers reflecting legal

advice and thoughts and mental impressions of industry counsel and providing information to assist counsel in the rendition of legal advice regarding CTR Special Projects research and various other joint industry issues to be discussed at a joint industry meeting of industry counsel, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 123055
MINN NUMBERS: LG 2008883/2008883

TYPE: LT
DATE: 2/23/66
AUTHOR: Yeaman A.
RECIPIENT: Clements E.
Haas F.
Hetscko C.
Ramm H.
Russell P.
Smith P.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Yeaman to Liggett in-house counsel Haas and counsel for certain cigarette manufacturers as to agenda for meeting of industry counsel and reflecting thoughts and mental impressions of industry counsel and providing information to assist industry counsel in the rendition of legal advice regarding various joint industry issues including CTR Special Projects research, the Tobacco Industry Advertising Code and pending industry litigation within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10

CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 122975
MINN NUMBERS: LG 2008891/2008895

TYPE: LT
DATE: 5/15/68
AUTHOR: Austern T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Austern, outside
counsel for Liggett and certain cigarette
manufacturers, to attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, providing legal advice and the
thoughts and impressions of industry counsel and
relating legal advice provided by counsel for
certain cigarette manufacturers regarding an
industry draft report in response to a HEW
report concerning smoking and health within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2009595/2009595

TYPE: LT
DATE: 1/7/85
AUTHOR: Sirridge P.

RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and impressions of industry counsel
regarding funding of joint industry funded
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009596/2009596

TYPE: LT
DATE: 1/31/85
AUTHOR: Hoel D.
RECIPIENT: Chapin J.
Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Chilcote S.
Jacob E.
Kornegay H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette

manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers and Tobacco Institute executive), providing legal advice and the thoughts and impressions of industry counsel regarding funding of a research proposal within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009597/2009598

TYPE: LT
DATE: 2/8/85
AUTHOR: Sirridge P.
RECIPIENT: Henson A.

Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.
Decker F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing legal advice and the thoughts and impressions of industry counsel regarding funding of joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009599/2009599

TYPE: LT
DATE: 5/8/85
AUTHOR: Hoel D.
RECIPIENT: Chapin J.
Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Chilcote S.
Jacob E.
Kornegay H.
Decker F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
outside counsel for Liggett, counsel for
certain cigarette manufacturers and Tobacco
Institute executive) providing legal advice and
the thoughts and impressions of industry counsel
regarding funding of institutional grants
research within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009600/2009602

TYPE: LT
DATE: 8/12/85
AUTHOR: Stanford L.
RECIPIENT: Ahrensfeld T.
Chapin J.
Henson A.
Murray J.
Pepples E.
Stevens A.
Witt S. cc: Kornegay H.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Stanford, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to counsel for certain
cigarette manufacturers and Tobacco Institute
executive) providing legal advice and the
thoughts and impressions of industry counsel
regarding joint industry funded research within
a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009603/2009603

TYPE: LT
DATE: 10/24/85

AUTHOR: Sirridge P.
RECIPIENT: Henson A.
Holtzman A.
Murray J.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
outside counsel for Liggett, and counsel for
certain cigarette manufacturers) providing legal
advice and the thoughts and impressions of
industry counsel regarding funding of joint
industry funded research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009604/2009605

TYPE: LT
DATE: 2/25/86
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A. cc: Brown J.
Decker F.
Jacob E.
Nims M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
outside counsel for Liggett, and counsel for
certain cigarette manufacturers) providing legal
advice and the thoughts and impressions of
industry counsel regarding funding of joint
industry funded research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009607/2009611

TYPE: LT
DATE: 3/27/87
AUTHOR: Hoel D.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A. cc: Chapin
J.
Cherry J.
Rupp J.
Schechter D.
Temko S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorneys Rupp and
Temko, outside counsel for Liggett and certain

cigarette manufacturers, and counsel for certain cigarette manufacturers) providing legal advice and the thoughts and impressions of industry counsel regarding a proposed area of joint industry research and enclosing correspondence from Kloepfer to Hoel, relating to same within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3 4X 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2009612/2009613

TYPE: LT
DATE: 3/5/87
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A. cc: Brown J.
Decker F.
Nims M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing legal advice and the thoughts and impressions of industry counsel regarding funding of joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009614/2009615

TYPE: LT
DATE: 3/14/89
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A. cc: Brown J.
Decker F.
Nims M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
outside counsel for Liggett, and counsel for
certain cigarette manufacturers) providing legal
advice and the thoughts and impressions of
industry counsel regarding funding of joint
industry funded research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009616/2009619

TYPE: LT
DATE: 8/24/89
AUTHOR: Sirridge P.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.
Randour P.
Stevens A. cc: Brown J.
Decker F.
Nims M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing legal advice and the thoughts and impressions of industry counsel regarding funding of joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009620/2009621

TYPE: LT
DATE: 1/4/89
AUTHOR: Stanford L.
RECIPIENT: Holtzman A.
Juchatz W.
Murray J.
Pepples E.

Randour P.
Stevens A. cc: Brown J.
Decker F.
Nims M.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Stanford, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
outside counsel for Liggett, and counsel for
certain cigarette manufacturers) providing legal
advice and the thoughts and impressions of
industry counsel regarding funding of joint
industry funded research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2009637/2009637

TYPE: LT
DATE: 2/27/84
AUTHOR: Stevens A.
RECIPIENT: Holtzman A.
Finnegan T.
Murray J.
Pepples E.
Witt S.
Shinn W.
Wall
Henson A. cc: Cherry J.
Greer J.
Jacob E.
Sirridge P.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Lorillard in-house counsel

Stevens to Liggett in-house counsel Murray, attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers and counsel for certain cigarette manufacturers (copies to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers), concerning agenda for meeting of counsel reflecting legal advice, within a joint defense of pending or anticipated litigation regarding CTR Special Projects research and the information retrieval system to be used to assist counsel in the joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 134567
MINN NUMBERS: LG 2010098/2010098

TYPE: LT
DATE: 7/31/81
AUTHOR: Decker F.
RECIPIENT: Shinn W. cc: Greer J.
O'Neill B.
Cohn D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Decker, outside counsel for Liggett, to attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers, (copies to Liggett in-house counsel Greer and attorney Cohn, outside counsel for Liggett) reflecting legal advice and thoughts and mental impressions of industry counsel concerning funding of joint industry funded research, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 99690
MINN NUMBERS: LG 2010183/2010192

TYPE: DR
DATE:
AUTHOR: Hetsko
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Draft public response prepared by Hetsko regarding a British report on smoking and health, containing handwritten notes by counsel for Liggett and for certain cigarette manufacturers reflecting thoughts and impressions of industry counsel concerning such report distributed within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 108187
MINN NUMBERS: LG 2010287/2010297

TYPE: LT
DATE:
AUTHOR: Tukey R.
RECIPIENT: Jacobs E.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum prepared by Tukey, Department of

Mathematics, Princeton University, consultant to certain cigarette manufacturers at the request of counsel for certain cigarette manufacturers to assist industry counsel in rendition of legal advice concerning pending smoking and health litigation and distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 135740
MINN NUMBERS: LG 2010694/2010694

TYPE: LT
DATE: 2/17/78
AUTHOR: Finnegan T.
RECIPIENT: Shinn W.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Finnegan, outside litigation counsel for certain cigarette manufacturers, to in-house counsel for the cigarette manufacturers and other outside counsel for certain cigarette manufacturers, providing legal advice concerning decisions made within a joint defense of pending or anticipated litigation, respecting funding of CTR Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 132993
MINN NUMBERS: LG 2010801/2010802

TYPE: LT
DATE: 5/25/77
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.

Greer J.
Hetsko C.
Pepples E.
Roemer H.
Stevens A.
Bryant D.
Chapin J.
Crohn M.
Holtzman A.
Kornegay H.
Pollack L.
Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Shinn, outside counsel for Liggett and other tobacco companies, and in-house counsel for several tobacco companies, including Liggett in-house counsel Greer, reflecting the legal advice and thoughts and mental impressions of industry counsel regarding institutional grants research within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 115540
MINN NUMBERS: LG 2010822/2010822

TYPE: IM
DATE: 11/23/77
AUTHOR: Greer J.

RECIPIENT: Dey K.
Hooker R.

REQ NUMBER: 1 RFP 4

PRIVILEGE: AC; WP; JD

DESCRIPTION: Internal memorandum from Liggett in-house counsel Greer to Liggett executive Dey (copy to Liggett in-house counsel Hooker) reflecting the legal advice and thoughts and mental impressions of industry counsel and requesting information necessary for the rendition of legal advice regarding industry response to a speech concerning smoking and health issues, within a joint defense of pending or anticipated litigation.

PRIV A; C

CATEGORY:

SUBJ 4X; 5

CATEGORY:

DOCUMENT LOCATION: 5

LIG NUMBERS: 107200

MINN NUMBERS: LG 2010866/2010869

TYPE: LT

DATE: 8/4/78

AUTHOR: Greer J.

RECIPIENT: COHN

cc DECKER
BC DEY
BC HOOKER/LEGAL FI
BC Provost
BC Robinson
BC Seidensticker

REQ NUMBER: 1 RFP 4, 130, 135

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from Liggett in-house counsel Greer to Liggett outside counsel Cohn (copies to other Liggett executives and Liggett in-house counsel Hooker) requesting legal advice regarding a proposed joint industry advertising campaign and reflecting legal advice and thoughts and mental impressions of counsel for other cigarette manufacturers, within a joint

defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 169753
MINN NUMBERS: LG 2010901/2010901

TYPE: LT
DATE: 1/25/79
AUTHOR: Kersey R.
RECIPIENT: Topol A. CC: Greer J.

REQ NUMBER: 1 RFP 4, 40, 133
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Liggett Research Vice
President Kersey to Topol, outside counsel for
Liggett and other tobacco companies, (copy to
Liggett in-house counsel Greer) conveying
information requested by industry counsel for
the rendition of legal advice regarding
activities of the FTC concerning carbon monoxide
testing within a joint defense of pending or
anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 169756
MINN NUMBERS: LG 2010936/2010938

TYPE: IM

DATE: 2/5/79
AUTHOR: Mold J.
RECIPIENT: Greer J. CC: Kersey
R., Norman V.

REQ NUMBER: 1 RFP 4, 40, 133, 134
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett research executive Mold to Liggett in-house counsel Greer (copies to Liggett executives Kersey and Norman) conveying information requested by industry counsel for the rendition of legal advice regarding activities of the FTC concerning carbon monoxide testing and distributed to Covington & Burling within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 64013
MINN NUMBERS: LG 2010939/2010955

TYPE: LT
DATE: 2/8/79
AUTHOR: Topol A.
RECIPIENT: Ahresnfeld, Crohn,
Greer, Henson,
Pepples, Stevens cc:
Hughes, Kersey, Leake
G., Seligman, Senkus,
Spears, Kornegay,
Finnegan, Temko,
Arkin, Austern, Shinn,
Steele, Gastman

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Topol, counsel for Liggett and other cigarette manufacturers, to cigarette manufacturer researchers and in-house and outside counsel, providing legal advice within a joint defense of pending or anticipated

litigation, and reflecting the thoughts and mental impressions of industry counsel regarding activities of the FTC concerning carbon monoxide testing, including draft public statements prepared by industry counsel regarding the same.

PRIV A; B; C
CATEGORY:

SUBJ 3; 4X; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 135190
MINN NUMBERS: LG 2010956/2010956

TYPE: LT
DATE: 4/9/79
AUTHOR: Sirridge P.
RECIPIENT: COLBY F.
FAGAN R.
HUGHES I.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Sirridge, outside counsel for Liggett and other tobacco companies, to Drs. Colby, Fagan, and Hughes providing legal advice and reflecting the thoughts and mental impressions of industry counsel regarding joint industry funded research, within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135220
MINN NUMBERS: LG 2010957/2010960

TYPE: LT
DATE: 4/27/79
AUTHOR: Sirridge
RECIPIENT: Ahrensfeld
Crohn
Greer
Henson
Pepples
Stevens
cc Holtzman
cc Kornegay

REQ NUMBER: 1 RFP 4, 37, 41, 59
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Sirridge, outside counsel for Liggett and other tobacco companies, to counsel for several tobacco companies, including Liggett in-house counsel Greer, reflecting the legal advice and thoughts and mental impressions of industry counsel regarding a conference concerning law, science and technology in health risk regulation and correspondence from Hoel, outside counsel for Liggett and other tobacco companies, to counsel for several tobacco companies, including Liggett in-house counsel Greer, reflecting the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135102
MINN NUMBERS: LG 2010983/2010983

TYPE: LT
DATE: 10/9/79
AUTHOR: Hardy D.

RECIPIENT: Jacob E.
cc: Ahrensfeld T.
cc: Crohn M.
cc: Greer J.
cc: Henson A.
cc: Pepples E.
cc: Stevens A.
cc: Bryant D.
cc: Brown J.
cc: Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hardy, outside counsel for Liggett and other tobacco companies, to Jacob, outside counsel for RJR, reflecting the thoughts and mental impressions of industry counsel regarding joint industry funded research to assist industry counsel in the rendition of legal advice, within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 18837
MINN NUMBERS: LG 2011235/2011236

TYPE: LT
DATE: 8/9/68
AUTHOR: Decker F.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Decker, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Haas providing the legal advice and thoughts and impressions of industry counsel and enclosing material regarding the information retrieval system to be used to assist counsel in the joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Z; 7
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 135604
MINN NUMBERS: LG 2011286/2011287

TYPE: LT
DATE: 8/7/78
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Greer J.
Henson A.
Pepples E.
Roemer H.
Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
providing the legal advice and thoughts and
mental impressions of industry counsel regarding
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133692

MINN NUMBERS: LG 2011289/2011290

TYPE: LT
DATE: 1/21/76
AUTHOR: Hardy D.
RECIPIENT: Ahrensfeld T.
Bryant D.
Haas F.
Hetsko C.
Roemer H.
Stevens A. cc: Greer J.
Holtzman A.
Pepples E.
Pollack L.
Kornegay H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
(copies to Liggett in-house counsel Greer and
counsel for certain cigarette manufacturers)
providing the legal advice and thoughts and
mental impressions of industry counsel regarding
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS:
MINN NUMBERS: LG 2011291/2011291

TYPE: LT
DATE: 10/16/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Greer J.
Henson A.
Pepples E.
Roemer H.

Stevens A. cc: Brown J.
Jacob E.
Holtzman A.
Bryant D.
Crohn M.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett counsel Greer and
counsel for certain cigarette manufacturers
(copies to Liggett in-house counsel Greer and
counsel for certain cigarette manufacturers)
providing the legal advice and thoughts and
mental impressions of industry counsel regarding
joint industry research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135477
MINN NUMBERS: LG 2011292/2011292

TYPE: LT
DATE: 12/4/78
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.
Bryant D.
Roemer H.
Greer J.
Pollack L.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers, to counsel for certain cigarette manufacturers (copies to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135432
MINN NUMBERS: LG 2011293/2011293

TYPE: LT
DATE: 3/7/79
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.
Bryant D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; C

CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135379
MINN NUMBERS: LG 2011294/2011295

TYPE: LT
DATE: 4/13/79
AUTHOR: Hoel D.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.
Bryant D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135039
MINN NUMBERS: LG 2011296/2011316

TYPE: LT
DATE: 11/13/79
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel and enclosed materials regarding joint
industry funded research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135093
MINN NUMBERS: LG 2011317/2011322

TYPE: LT
DATE: 10/24/79
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.

Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel and enclosed materials regarding joint
industry funded research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135014
MINN NUMBERS: LG 2011323/2011324

TYPE: LT
DATE: 1/30/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers

(copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel and enclosed correspondence regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134924
MINN NUMBERS: LG 2011325/2011326

TYPE: LT
DATE: 5/9/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134792
MINN NUMBERS: LG 2011327/2011327

TYPE: LT
DATE: 9/18/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfeld T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134778
MINN NUMBERS: LG 2011328/2011341

TYPE: LT
DATE: 9/19/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel and relating legal advice provided by
B&W in-house counsel Pepples and enclosed
materials regarding joint industry funded
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 11
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134754
MINN NUMBERS: LG 2011342/2011355

TYPE: LT
DATE: 11/6/80
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.

Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel and enclosing materials regarding joint
industry funded research within a joint defense
of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134704
MINN NUMBERS: LG 2011356/2011356

TYPE: LT
DATE: 11/26/80
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research

within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134672
MINN NUMBERS: LG 2011357/2011360

TYPE: LT
DATE: 2/6/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel and enclosed correspondence regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134671
MINN NUMBERS: LG 2011361/2011361

TYPE: LT
DATE: 2/6/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134599
MINN NUMBERS: LG 2011362/2011362

TYPE: LT
DATE: 4/16/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfield T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134582
MINN NUMBERS: LG 2011363/2011364

TYPE: LT
DATE: 5/5/81
AUTHOR: Sirridge P.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.
Holtzman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette

manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134578
MINN NUMBERS: LG 2011365/2011368

TYPE: LT
DATE: 5/28/81
AUTHOR: Shinn W.
RECIPIENT: Ahrensfield T.
Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel and enclosed correspondence regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134570
MINN NUMBERS: LG 2011369/2011370

TYPE: LT
DATE: 7/23/81
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.
Decker F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134544

MINN NUMBERS: LG 2011371/2011372

TYPE: LT
DATE: 11/19/81
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134519
MINN NUMBERS: LG 2011373/2011374

TYPE: LT
DATE: 11/24/81
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134302
MINN NUMBERS: LG 2011379/2011379

TYPE: LT
DATE: 2/26/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C

CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134234
MINN NUMBERS: LG 2011380/2011381

TYPE: LT
DATE: 3/23/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134233
MINN NUMBERS: LG 2011382/2011382

TYPE: LT
DATE: 4/2/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134146
MINN NUMBERS: LG 2011383/2011384

TYPE: LT
DATE: 8/20/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.

Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding a research proposal within a
joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134126
MINN NUMBERS: LG 2011385/2011386

TYPE: LT
DATE: 10/5/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated

litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134116
MINN NUMBERS: LG 2011387/2011388

TYPE: LT
DATE: 10/5/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134114
MINN NUMBERS: LG 2011389/2011390

TYPE: LT
DATE: 11/12/82
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134104
MINN NUMBERS: LG 2011391/2011392

TYPE: LT
DATE: 1/26/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.

Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134075
MINN NUMBERS: LG 2011393/2011393

TYPE: LT
DATE: 2/25/83
AUTHOR: Shinn W.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry

counsel regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134108
MINN NUMBERS: LG 2011394/2011394

TYPE: LT
DATE: 3/14/83
AUTHOR: Decker F.
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to attorney Decker, outside counsel for
Liggett, providing information to assist
industry counsel in the rendition of legal
advice regarding joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134048
MINN NUMBERS: LG 2011395/2011398

TYPE: LT

DATE: 5/6/83
AUTHOR: Shinn W.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to counsel for certain cigarette
manufacturers) providing the legal advice and
thoughts and mental impressions of industry
counsel and enclosing information regarding
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 134035
MINN NUMBERS: LG 2011399/2011399

TYPE: LT
DATE: 6/9/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to attorney Decker, Liggett outside counsel, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133959

MINN NUMBERS: LG 2011400/2011400

TYPE: LT

DATE: 7/6/83

AUTHOR: Greer J.

RECIPIENT: Sirridge P.

Dey K.

Murray J.

Welsh D. cc: Brown J.

Decker F.

Jacob E.

REQ NUMBER: 1 RFP 4, 130

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from Liggett in-house counsel Greer to attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, (copies to Liggett in-house counsel Murray and Liggett executives Dey and Welsh) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 121456
MINN NUMBERS: LG 2011401/2011402

TYPE: LT
DATE: 7/28/83
AUTHOR: Decker F.
RECIPIENT: Greer J.
Murray J. cc: Hooker R.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Decker, outside
counsel for Liggett, to Liggett in-house counsel
Greer and Murray (copy to Liggett in-house
counsel Hooker) providing the legal advice and
thoughts and mental impressions of industry
counsel regarding an industry position paper
concerning tobacco addiction within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 94770
MINN NUMBERS: LG 2011403/2011404

TYPE: LT
DATE: 10/20/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Hotlzman A.

Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.
Murray J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and other cigarette
manufacturers, to Liggett in-house counsel Greer
and in-house and outside counsel for certain
cigarette manufacturers, discussing and
enclosing materials and requesting the thoughts
and mental impressions of industry counsel
regarding joint industry funded research, within
a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133879
MINN NUMBERS: LG 2011405/2011406

TYPE: LT
DATE: 10/20/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.
Murray J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette

manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to Liggett in-house counsel Murray and attorney Decker, Liggett outside counsel, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133860
MINN NUMBERS: LG 2011407/2011408

TYPE: LT
DATE: 1/5/84
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
CC MURRAY J.
CC Brown J.
CC DECKER F.
CC Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to Liggett in-house counsel Murray, attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133751
MINN NUMBERS: LG 2011409/2011410

TYPE: LT
DATE: 7/30/84
AUTHOR: Sirridge P.
RECIPIENT: Murray J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, Liggett outside counsel, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133792
MINN NUMBERS: LG 2011411/2011412

TYPE: LT
DATE: 3/6/84
AUTHOR: Sirridge P.
RECIPIENT: Murray J.
Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside

counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, Liggett outside counsel, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133823
MINN NUMBERS: LG 2011413/2011414

TYPE: LT
DATE: 3/5/84
AUTHOR: Sirridge P.
RECIPIENT: Murray J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.
Spears A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to attorney Decker,
Liggett outside counsel, and counsel for certain
cigarette manufacturers) providing the legal
advice and thoughts and mental impressions of
industry counsel regarding joint industry funded
research within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133825
MINN NUMBERS: LG 2011415/2011416

TYPE: LT
DATE: 2/1/84
AUTHOR: Sirridge P.
RECIPIENT: Murray J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Decker F.
Jacob E.
Spears A.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray and counsel for certain cigarette manufacturers (copies to attorney Decker, Liggett outside counsel, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133832
MINN NUMBERS: LG 2011417/2011418

TYPE: LT
DATE: 1/5/84
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S. cc: Brown J.
Jacob E.
Murray J.
Decker F.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to Liggett in-house counsel Murray, attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers) providing the legal advice and thoughts and mental impressions of industry counsel regarding

joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 133863
MINN NUMBERS: LG 2011419/2011420

TYPE: LT
DATE: 6/29/83
AUTHOR: Sirridge P.
RECIPIENT: Greer J.

Henson A.
Holtzman A.
Pepples E.
Stevens A.
Witt S.
CC Brown J.
CC Jacob E.
CC DECKER F.

REQ NUMBER:
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Sirridge, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Greer
and counsel for certain cigarette manufacturers
(copies to Liggett in-house counsel Murray,
attorney Decker, outside counsel for Liggett,
and counsel for certain cigarette manufacturers)
providing the legal advice and thoughts and
mental impressions of industry counsel regarding
joint industry funded research within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 135776
MINN NUMBERS: LG 2011421/2011422

TYPE: LT
DATE: 10/31/77
AUTHOR: HOEL
RECIPIENT: Ahrensfield

Greer
Henson
Pepples
ROEMER
Stevens
CC Bryant
CC Crohn
CC Holtzman
CC Pollack
CC Brown
CC Jacob

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Letter from attorney Hoel, outside counsel for
Liggett and other cigarette manufacturers, to
in-house counsel for cigarette manufacturers
providing legal advice and thoughts and mental
impressions of industry counsel regarding a
research proposal, within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 54311
MINN NUMBERS: LG 2011459/2011461

TYPE: IM

DATE: 6/16/66
AUTHOR: Haas F.
RECIPIENT: Harrington M.
Old J. cc: Bates W.

REQ NUMBER: 1 RFP 4, 128, 132
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executives Harrington
and Old (copy Liggett research director Bates)
providing legal advice and relating legal advice
provided by counsel for certain cigarette
manufacturers regarding operations of CTR, a
proposed symposium concerning smoking and
health, proposed NAB guidelines concerning
cigarette advertising and CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93663
MINN NUMBERS: LG 2011500/2011500

TYPE: IM
DATE: 2/16/72
AUTHOR: Morgenthaler C.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 34
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Morgenthaler reflecting the thoughts and
impressions of industry counsel regarding joint
industry funded research to assist industry
counsel in the rendition of legal advice within
a joint defense of pending or anticipated
litigation with the handwritten notes of
attorney Morgenthaler regarding same.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65124
MINN NUMBERS: LG 2011501/2011503

TYPE: NO
DATE: 12/11/75
AUTHOR: Kersey R.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37, 133
PRIVILEGE: WP; AC; JD
DESCRIPTION: Handwritten notes of Liggett executive Kersey relating legal advice provided by counsel for certain cigarette manufacturers and information to assist industry counsel in the rendition of legal advice regarding institutional grants research and joint industry funded research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 111159
MINN NUMBERS: LG 2011537/2011537

TYPE: IM
DATE: 11/20/62
AUTHOR: Horan F.
RECIPIENT: Blount

REQ NUMBER: 1 RFP 4

PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Horan to Liggett executive Blount
reflecting the thoughts and impressions of
industry counsel regarding a proposed joint
industry advertising campaign within a joint
defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 5; 8
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 26984
MINN NUMBERS: LG 2011538/2011538

TYPE: IM
DATE: 11/25/63
AUTHOR: Haas F.
RECIPIENT: Horan F., Toms Z.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executives Toms and
Horan reflecting the thoughts and impressions of
industry counsel and rendering legal advice
regarding network broadcast of interviews with
doctors concerning smoking and health issues
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 105749
MINN NUMBERS: LG 2011883/2011884

TYPE: LT
DATE: 12/2/81
AUTHOR: Witt
RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Witt, in-house counsel for R.J. Reynolds, to Committee of Counsel enclosing an agenda for a meeting of the Committee, reflecting the thoughts and mental impressions of industry counsel regarding various joint industry issues including DHHS ingredients disclosure and CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 95362
MINN NUMBERS: LG 2011886/2011887

TYPE: DR
DATE: 12/8/81
AUTHOR: Tobacco Institute
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Draft press release prepared by the Tobacco Institute and forwarded to the Committee of Counsel requesting the thoughts and mental impressions and legal advice of industry counsel regarding proposed FTC health warning notice regulations within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 95278
MINN NUMBERS: LG 2011891/2011892

TYPE: LT
DATE: 1/6/82
AUTHOR: Witt S.
RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Witt, in-house
counsel for R.J. Reynolds, to the Committee of
Counsel enclosing an agenda for a meeting of the
Committee, reflecting the thoughts and mental
impressions of industry counsel regarding
various joint industry issues including proposed
legislation concerning advertising, CTR Special
Projects research and institutional grants
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 8; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 100221
MINN NUMBERS: LG 2011969/2011975

TYPE: NO
DATE: 3/18/82
AUTHOR: Greer J.

RECIPIENT:

REQ NUMBER: 1 RFP 4, 37, 107
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of Liggett in-house counsel Greer concerning a Committee of Counsel meeting and reflecting the thoughts and mental impressions of Liggett counsel and counsel for other cigarette manufacturers regarding various joint industry issues including pending legislative hearings concerning proposed advertising legislation, pending asbestos litigation, joint industry funded research, DHHS ingredients disclosure and activities of the FTC concerning carbon monoxide testing within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 100160
MINN NUMBERS: LG 2011977/2011978

TYPE: LT
DATE: 4/6/82
AUTHOR: HOEL D.
RECIPIENT: Witt S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hoel, outside counsel for Liggett and other cigarette manufacturers, to attorney Witt, in-house counsel for R.J. Reynolds, reflecting his thoughts and mental impressions and legal advice of industry counsel regarding a proposed public smoking symposium within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 100335
MINN NUMBERS: LG 2011987/2011987

TYPE: LT
DATE: 5/19/82
AUTHOR: Witt S.
RECIPIENT: Comm of Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Witt, in-house
counsel for R.J. Reynolds, to the Committee of
Counsel, providing a meeting agenda reflecting
the thoughts and mental impressions of industry
counsel regarding various joint industry issues
including the Tobacco Industry Advertising Code,
DHHS ingredients disclosure and CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 93861
MINN NUMBERS: LG 2011988/2011990

TYPE: IM
DATE: 5/20/82
AUTHOR: Covington & Burling
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD

DESCRIPTION: Memorandum prepared by Covington & Burling reflecting thoughts and mental impressions and legal advice of counsel for Liggett and other cigarette manufacturers regarding joint industry lobbying activities within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 100298
MINN NUMBERS: LG 2011996/2012003

TYPE: NO
DATE: 6/22/82
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 10, 47, 53
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of Liggett in-house counsel Greer concerning a Committee of Counsel meeting and reflecting the thoughts and mental impressions of Liggett counsel and counsel for other cigarette manufacturers regarding various joint industry issues including self extinguishing cigarettes, a proposed public smoking symposium, proposed legislation concerning product liability, asbestos compensation and cigarette advertising, DHHS ingredients disclosure and the information retrieval system to be used to assist counsel in the joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 105320
MINN NUMBERS: LG 2012043/2012062

TYPE: IM
DATE: 7/2/82
AUTHOR: Dey K.
RECIPIENT: Greer
CC GRANT H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett executive Dey
to Liggett in-house counsel Greer (copy to
executive Grant) enclosing and requesting legal
advice regarding a proposed joint industry
advertising campaign within a joint defense of
pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5; 8
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 105265
MINN NUMBERS: LG 2012064/2012066

TYPE: LT
DATE: 7/23/82
AUTHOR: Shinn W.
RECIPIENT: Witt S.

cc Greer J.
cc Holtzman
cc Henson A.
cc Pepples E.
cc Stevens A.
cc Temko S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from attorney Shinn, outside

counsel for Liggett and other cigarette manufacturers, to attorney Witt, in-house counsel for R.J. Reynolds, providing information and reflecting his thoughts and mental impressions regarding a proposed joint industry advertising campaign within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 95196
MINN NUMBERS: LG 2012101/2012102

TYPE: LT
DATE: 8/27/82
AUTHOR: Witt S.
RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Witt, in-house counsel for R.J. Reynolds, to Committee of Counsel providing a meeting agenda reflecting the thoughts and mental impressions of industry counsel regarding various joint industry issues including pending asbestos litigation, DHHS ingredients disclosure, and a pending FTC antitrust investigation to assist industry counsel within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99197
MINN NUMBERS: LG 2012104/2012104

TYPE: LT
DATE: 2/25/80
AUTHOR: Ahrensfeld T.
RECIPIENT: Austern

Chapin
Crohn
Greer
Pepples
Shinn
Stevens
Temko
Kornegay
Ehringhaus

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Ahrensfeld, in-house counsel for Philip Morris, to Liggett in-house counsel Greer and in-house and outside counsel for other cigarette manufacturers (copies to Tobacco Institute executive Kornegay and attorney Ehringhaus), concerning a meeting of the Committee of Counsel and reflecting the thoughts and mental impressions of industry counsel regarding various joint industry issues including pending FTC Consent Order litigation, self extinguishing cigarettes, institutional grants research and CTR Special Projects research to be discussed within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 122988
MINN NUMBERS: LG 2012107/2012107

TYPE: LT
DATE: 5/16/67
AUTHOR: Yeaman A.
RECIPIENT: Haas

Hetsko
Ramm
Smith
Clements

REQ NUMBER: 1 RFP 4, 32, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Yeaman, B&W in-house
counsel, to counsel for several tobacco
companies, including Liggett in-house counsel
Haas, reflecting the thoughts and mental
impressions of industry counsel regarding
various joint industry issues including CTR
Special Projects research within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99413
MINN NUMBERS: LG 2012111/2012112

TYPE: IM
DATE: 5/20/81
AUTHOR: Legal Counsel
(Inferred)
RECIPIENT: Committee of Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum appears to have been prepared by
counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding
various joint industry issues including
institutional grants research, DHHS ingredients
disclosure, pending FTC warning notice
litigation, CTR Special Projects research and
the information retrieval system to be used to

assist counsel in the joint defense of pending
or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 23845
MINN NUMBERS: LG 2012163/2012163

TYPE: LT
DATE: 4/17/70
AUTHOR: Smith P.
RECIPIENT: Haas

Pollack
Ramm
Yeaman

REQ NUMBER: 1 RFP 4, 37, 53
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Smith, counsel to Philip
Morris, to counsel to several tobacco companies
including Liggett in-house counsel Haas,
reflecting the thoughts and mental impressions
of industry counsel regarding research in
response to the Hammond and Auerbach studies
within a joint defense of within a joint defense
of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 108783

MINN NUMBERS: LG 2012173/2012174

TYPE: LT
DATE: 6/12/70
AUTHOR: Shinn
RECIPIENT: Haas
Hetsko
Ramm
Smith
Stevens
Yeaman
cc Pollack

REQ NUMBER: 1 RFP 4, 42
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Shinn, outside counsel to Liggett and other tobacco companies, to counsel for several tobacco companies, including Liggett in-house counsel Haas, reflecting the thoughts and mental impressions of industry counsel regarding a program concerning smoking and health claims within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2012501/2012511

TYPE: NO
DATE:
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel Greer reflecting the thoughts and impressions of industry counsel regarding CTR Special Projects research, joint industry funded research, institutional grants research, pending smoking and health litigation and research activities of

the Tobacco Working Group of the National Cancer Institute and reflecting legal advice provided by counsel for certain cigarette manufacturers regarding same within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2012545/2012554

TYPE: LT
DATE: 8/1/75
AUTHOR: Kornegay H
Austern H.
RECIPIENT: Stevens A
Ahrensfield T
Bryant D
Haas F
Hetsko C
Roemer H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Tobacco Institute executives to Liggett in-house counsel Haas and counsel for certain cigarette manufacturers providing information to assist industry counsel in the rendition of legal advice regarding pending FTC Consent Order litigation distributed within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 95113
MINN NUMBERS: LG 2014927/2014931

TYPE: IM
DATE: 6/8/83
AUTHOR: Murray J
RECIPIENT: File

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum prepared by Liggett in-house counsel
Murray to file, concerning a Committee of
Counsel meeting and reflecting the thoughts and
mental impressions of Liggett counsel and
counsel for other cigarette manufacturers
regarding various joint industry issues
including proposed FTC warning notice
legislation, proposed cigarette advertising
legislation, DHHS ingredients disclosure and
proposed asbestos compensation legislation
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 31438
MINN NUMBERS: LG 2015011/2015100

TYPE: IM
DATE:
AUTHOR: Covington & Burling
RECIPIENT: Greer J.

REQ NUMBER: 1 RFP 4, 41, 45
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum prepared by Covington & Burling, with
handwritten notes of Liggett in-house counsel

Greer, reflecting legal advice and thoughts and mental impressions of industry counsel concerning proposed areas of industry research including proposals for CTR Special Projects research and joint industry funded research to assist industry counsel in the rendition of legal advice, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2015145/2015152

TYPE: NO
DATE: 6/30/71
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting legal advice and thoughts and mental impressions of industry counsel regarding various joint industry issues including CTR Special Projects research and joint industry lobbying activities within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015199/2015206

TYPE: NO
DATE: 8/18/70
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including proposed FTC
advertising regulations, chemosol research,
proposed consumer protection legislation and
operations of CTR within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015214/2015220

TYPE: NO
DATE: 3/3/69
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including a German study
concerning smoking and health, CTR Special
Projects research and proposed CAB smoking on
aircraft regulations within a joint defense of

pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015235/2015240

TYPE: NO
DATE: 3/10/69
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including proposed warning
notice legislation, proposed ICC, FAA and CAB
regulations concerning smoking on carriers,
chemosol research, joint industry funded
research and proposed tax legislation within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015241/2015244

TYPE: NO
DATE: 1/23/69
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including proposed warning
notice legislation and CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2015249/2015250

TYPE: NO
DATE: 3/26/69
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including research activities of
the HEW, joint industry funded research and
proposed FCC advertising regulations within a
joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10

CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015251/2015256

TYPE: NO
DATE: 7/23/69
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including HEW's Report to
Congress and CTR Special Projects research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015260/2015265

TYPE: NO
DATE: 4/8/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD

DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research and the information retrieval system to
be used to assist counsel in the joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015266/2015270

TYPE: NO
DATE: 1/24/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015271/2015271

TYPE: NO
DATE: 7/1/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including FTC advertising
regulations within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015272/2015276

TYPE: NO
DATE: 3/20/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including industry response to
various antismoking advertisements and articles
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015282/2015288

TYPE: NO
DATE: 2/7/68
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including proposed advertising
legislation and joint industry funded research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015295/2015295

TYPE: NO
DATE: 12/19/67
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41

PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015313/2015319

TYPE: NO
DATE: 11/1/67
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015344/2015350

TYPE: NO
DATE:
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015395/2015402

TYPE: NO
DATE: 5/26/67
AUTHOR: Haas F.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Haas at meeting of industry counsel reflecting
legal advice and thoughts and mental impressions
of industry counsel regarding various joint
industry issues including CTR Special Projects
research, joint industry funded research and
chemosol research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2015604/2015606

TYPE: IM
DATE: 7/8/75
AUTHOR: Hill J.
RECIPIENT: Welsh D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Hill to
Liggett executive Welsh providing legal advice
and thoughts and mental impressions of industry
counsel concerning the information retrieval
system to be used to assist counsel in the joint
defense and attaching letter from Ramm to Hill
reflecting the same, within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2015964/2015967

TYPE: IM
DATE: 4/25/88
AUTHOR: Murray J.
RECIPIENT: Dey K.

REQ NUMBER: 1 RFP 4, 37, 130

PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Murray to Liggett executive Dey
providing legal advice regarding pending
congressional hearings concerning smoking and
health issues and pending smoking and health
litigation and relating legal advice and
enclosed correspondence from attorney Dym,
outside counsel for Liggett and certain
cigarette manufacturers, regarding same within a
joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4X; 4Y; 4Z; 6; 8; 9; 10
CATEGORY:
DOCUMENT LOCATION: 9

LIG NUMBERS: 0
MINN NUMBERS: LG 2016240/2016263

TYPE: LT
DATE: 6/2/88
AUTHOR: Dym H.
RECIPIENT: Juchatz W.

Murray J.
Newman F.
Pepples E.
Randour
Stevens A. cc: Bring
Copenhaver
Hoel D.
Hardy D.
Knorr
Krash A.
Lewis R.
Long
McDermott
Mitchell
O'Connell
O'Neill
Sachs
Stanford
Zausner

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Dym, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to counsel for certain
cigarette manufacturers) providing legal advice
and enclosing draft industry statements relating
same regarding proposed legislation and
congressional hearings concerning cigarette
labeling within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2016264/2016371

TYPE: LT
DATE: 5/27/88
AUTHOR: Dym H.
RECIPIENT: Juchatz W.

Murray J.
Newman F.
Pepples E.
Randour
Stevens A. cc: Bring
Copenhaver
Hoel D.
Hardy D.
Knorr
Krash A.
Lewis R.
Long
McDermott
Mitchell
O'Connell
O'Neill
Sachs
Stanford
Zausner

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Dym, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray and counsel for certain cigarette
manufacturers (copies to counsel for certain
cigarette manufacturers) providing legal advice
and enclosing memorandum relating the same
regarding proposed legislation and congressional
hearings concerning cigarette labeling within a
joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:
SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 103136
MINN NUMBERS: LG 2016723/2016727

TYPE: IM
DATE: 4/2/73
AUTHOR: Greer J.
RECIPIENT: Mulligan
Haas F.

REQ NUMBER: 1 RFP 4, 3, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Greer
to other Liggett in-house counsel and their
client, a Liggett executive concerning a meeting
of counsel for the cigarette manufacturers at
which meeting advice was rendered concerning
decisions made in a joint defense in
anticipation of pending or anticipated
litigation, regarding various joint industry
issues including operations of the Tobacco
Institute, pending legislation concerning
consumer product warranties, activities of the
National Cancer Advisory Board concerning
proposed tobacco product regulations and CTR
Special Projects research.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 103141
MINN NUMBERS: LG 2016728/2016729

TYPE: IM
DATE: 4/11/73
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Greer to Liggett in-house counsel Haas
relating legal advice provided by attorney
Hardy, outside counsel for Liggett and certain
cigarette manufacturers, regarding CTR Special
Projects research within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 1; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 102843
MINN NUMBERS: LG 2016730/2016734

TYPE: IM
DATE: 4/2/73
AUTHOR: Greer J.
RECIPIENT: Mulligan J.

Haas F.

REQ NUMBER: 1 RFP 4, 3
PRIVILEGE: WP; AC; JD
DESCRIPTION: Memorandum from Liggett in-house counsel Greer
to other Liggett in-house counsel and their
client, a Liggett executive concerning a meeting
of counsel for the cigarette manufacturers at
which meeting advice was rendered concerning
decisions made in a joint defense in
anticipation of pending or anticipated
litigation, regarding various joint industry
issues including operations of the Tobacco
Institute, proposed legislation concerning
consumer product warranties, activities of the
National Cancer Advisory Board concerning
proposed tobacco product regulations and CTR
Special Projects research.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 38291
MINN NUMBERS: LG 2016846/2016897

TYPE: LT
DATE: 12/1/66
AUTHOR: Hardy D.
RECIPIENT: Haas F., Hetsko C.,
Ramm H., Smith P.,
Yeaman A., cc:
CLEMENTS E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and other cigarette
manufacturers, to Liggett in-house counsel Haas
and in-house counsel for other cigarette
manufacturers, discussing and enclosing draft
industry position paper reflecting the thoughts
and mental impressions and legal advice of
industry counsel regarding proposed legislation

concerning cigarette labeling and advertising
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 0
MINN NUMBERS: LG 2016954/2016986

TYPE: LT
DATE:
AUTHOR: Covington & Burling
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC: WP; JD
DESCRIPTION: Memorandum prepared by counsel for certain
cigarette manufacturers providing legal advice
and the thoughts and impressions of industry
counsel regarding proposed legislation
concerning labeling and advertising distributed
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 108059
MINN NUMBERS: LG 2017032/2017038

TYPE: IM

DATE: 5/28/58
AUTHOR: Haas F.
RECIPIENT: Chandler

Hewitt
Daniels
Horan
Johnston Hitchcock
cc: Few B.
Blount W.

REQ NUMBER: 1 RFP 4, 37, 41, 131
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Haas, outside
counsel for Liggett, to Liggett in-house counsel
Horan and counsel for other cigarette
manufacturers, reflecting the thoughts and
mental impressions of industry counsel regarding
joint industry funded research and pending
smoking and health litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 127352
MINN NUMBERS: LG 2017040/2017041

TYPE: LT
DATE: 9/17/68
AUTHOR: Kloepfer W.
RECIPIENT: Clements E. cc: Hardy
D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Tobacco Institute executive
Kloepfer to Tobacco Institute executive Clements
relating legal advice provided by attorney
Hardy, outside counsel for Liggett and certain
cigarette manufacturers, regarding a draft
industry position paper concerning a morbidity
study conducted by HEW within a joint defense of
pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2017053/2017056

TYPE: IM
DATE: 10/21/68
AUTHOR: Mold J
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 37, 128
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett researcher Mold
to Liggett research director Bates relating
legal advice provided by counsel for certain
cigarette manufacturers regarding chemosol
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 2; 3; 6
CATEGORY:
DOCUMENT LOCATION: 6

LIG NUMBERS: 0
MINN NUMBERS: LG 2017135/2017141

TYPE: LT
DATE:
AUTHOR: Epstein, Shafner
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by a joint industry consultant to counsel for certain cigarette manufacturers providing information to assist industry counsel in the rendition of legal advice regarding joint industry funded research distributed within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y; 2; 3; 11
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 23690
MINN NUMBERS: LG 2017191/2017191

TYPE: IM
DATE: 5/11/71
AUTHOR: O'Shea S.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 53
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from O'Shea to industry counsel, providing information requested by industry counsel for the rendition of legal advice and reflecting the thoughts and mental impressions of industry counsel regarding the Hammond and Auerbach studies within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS:
MINN NUMBERS: LG 2017192/2017192

TYPE: IM
DATE: 5/4/71
AUTHOR: O'Shea S.
RECIPIENT: System Users

REQ NUMBER: 1 RFP 4, 53
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from O'Shea to "users" of the information retrieval system created by counsel to assist in asserting a joint defense of pending or anticipated litigation, including industry counsel, providing information requested by industry counsel for the rendition of legal advice and reflecting the thoughts and mental impressions of industry counsel regarding the Hammond and Auerbach studies within that joint defense.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2017230/2017231

TYPE: IM
DATE: 7/26/72
AUTHOR: Greer J.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house counsel Greer to Liggett in-house counsel Haas providing legal advice and the thoughts and mental impressions of industry counsel regarding industry response to a British report concerning smoking and health issues within a joint defense of pending or anticipated litigation.

PRIV A; C

CATEGORY:

SUBJ 4X; 5

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 109009

MINN NUMBERS: LG 2017254/2017255

TYPE: LT

DATE: 10/2/69

AUTHOR: Kloepfer W.

RECIPIENT: Haas

Ramm
Smith
Yeaman
CC Hetsko
CC Stevens
CC Harrington
CC McALLISTER
CC Shinn
CC MILLHISER
CC STAFF
CC Pollack
CC Hardy
CC George
CC Holtzman

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; JD

DESCRIPTION: Correspondence from Tobacco Institute executive
Kloepfer to in-house counsel for Liggett and
counsel for other cigarette manufacturers
providing information to assist industry counsel
in the rendition of legal advice regarding a
television program concerning smoking and health
issues within a joint defense of pending or
anticipated litigation.

PRIV A

CATEGORY:

SUBJ 5

CATEGORY:

DOCUMENT LOCATION: 5

LIG NUMBERS: 109015
MINN NUMBERS: LG 2017256/2017258

TYPE: LT
DATE: 8/28/69
AUTHOR: Kloepfer W.
RECIPIENT: Haas
CC Hardy
CC Shinn
CC Austern
CC Clements

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Tobacco Institute executive
Kloepfer to Liggett in-house counsel Haas
(copies to counsel for several other cigarette
manufacturers) providing information to assist
industry counsel in the rendition of legal
advice regarding a television program concerning
smoking and health issues within a joint defense
of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 99200
MINN NUMBERS: LG 2017444/2017449

TYPE: NO
DATE: 2/28/80
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD

DESCRIPTION: Notes of Liggett in-house counsel concerning a meeting of the Committee of Counsel, reflecting the thoughts and mental impressions of Liggett counsel and counsel for other cigarette manufacturers regarding various joint industry issues including self-extinguishing cigarettes, smoking and health issues, proposed tax legislation, CTR Special Projects research and institutional grants research within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 135036
MINN NUMBERS: LG 2017532/2017532

TYPE: LT
DATE: 1/22/80
AUTHOR: Northrip R.
RECIPIENT: Ahrensfeld T.

Crohn M.
Greer J.
Henson A.
Pepples E.
Stevens A.
cc: Brown J.
cc: Holtzman A.
cc: Finnegan T.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Northrip (Shook, Hardy), outside counsel for Liggett and other cigarette manufacturers, to Liggett in-house counsel Greer and in-house counsel for other cigarette manufacturers (copies to outside counsel), reflecting the thoughts and mental impressions and legal advice of industry counsel regarding CTR Special Projects research within a joint defense of pending or anticipated litigation.

PRIV A; C

CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2017539/2017543

TYPE: IM
DATE: 4/3/81
AUTHOR: Mott, D.
RECIPIENT: Kersey, R.

REQ NUMBER: 1 RFP 4, 37, 47, 133
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett executive Mott to Liggett executive Kersey (copy to Liggett in-house counsel Greer), discussing and enclosing materials to assist industry counsel in the rendition of legal advice regarding smoking and health issues, distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4X; 6
CATEGORY:
DOCUMENT LOCATION: 6

LIG NUMBERS: 99315 - 99315
MINN NUMBERS: LG 2017634/2017634

TYPE: AG
DATE: 2/26/81
AUTHOR: Committee of Counsel
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Agenda for meeting of Committee of Counsel
reflecting the thoughts and mental impressions
of counsel regarding smoking and health issues
legislation and regulations, advertising issues,
distributed to counsel for Liggett and other
cigarette manufacturers within a joint defense
of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99355 - 99358
MINN NUMBERS: LG 2017635/2017638

TYPE: RP
DATE: 2/24/81
AUTHOR: Tobacco Institute
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37, 47
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by Tobacco Institute
providing information to assist counsel in the
rendition of legal advice regarding smoking and
health issues, within a joint defense of pending
or anticipated litigation.

PRIV B; C
CATEGORY:

SUBJ 2; 5; 6
CATEGORY:
DOCUMENT LOCATION: 6

LIG NUMBERS: 99373 - 99376
MINN NUMBERS: LG 2017640/2017643

TYPE: NO
DATE: 4/9/81
AUTHOR: Greer, J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Notes of Liggett in-house counsel Greer concerning a Committee of Counsel meeting, reflecting the thoughts and mental impressions of Liggett counsel and counsel for the other cigarette manufacturers regarding litigation matters, government regulations, FTC warning notice matters, and computer library issues, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 114492 - 114575
MINN NUMBERS: LG 2017654/2017736

TYPE: IM
DATE: 10/5/81
AUTHOR: Greer, J.
RECIPIENT: Dey, K.

REQ NUMBER: 1 RFP 4, 37, 130
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house counsel Greer to Liggett executive Dey requesting Dey's comments on an enclosed draft report prepared by counsel for certain cigarette manufacturers reflecting the thoughts and mental impressions and legal advice of industry counsel regarding an FTC report relating to advertising, within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 18734 - 18742
MINN NUMBERS: LG 2017901/2017909

TYPE: LT
DATE: 4/1/69
AUTHOR: Clark, H.
RECIPIENT: Austern, H.; cc:
Denniston, J.; O'Shea,
S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from consultant Clark to attorney
Austern, outside counsel for Liggett and certain
cigarette manufacturers, providing information
and proposed agreement regarding the compilation
of publicly available scientific research to
assist counsel in the rendition of legal advice
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018027/2018030

TYPE: LT

DATE: 3/24/87
AUTHOR: Kloepfer, W.
RECIPIENT: Hoel, D.; cc:
Chilcote, S.; Lewis,
R.; Mozingo, R.;
Sparber, P.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Tobacco Institute executive
Kloepfer to attorney Hoel, outside counsel for
Liggett and certain cigarette manufacturers
(copies to Tobacco Institute executive and
counsel for certain cigarette manufacturers),
providing information to assist counsel in the
rendition of legal advice regarding scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 11
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 18919 - 18923
MINN NUMBERS: LG 2018058/2018062

TYPE: LT
DATE: 12/15/66
AUTHOR: Brodsky, G.
RECIPIENT: Covington & Burling

REQ NUMBER: 1 RFP 4, 11
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Brodsky, Executive Director
of International Information Inc., to Covington
& Burling, counsel for Liggett and other tobacco
companies regarding the information retrieval
system to be used to assist industry counsel in
the joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z

CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018063/2018064

TYPE: OT
DATE: 1/1/64
AUTHOR:
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant regarding the
information retrieval system to be used to
assist industry counsel in the joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018065/2018083

TYPE: OT
DATE:
AUTHOR: 3I
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence and related information from
consultant regarding the information retrieval
system to be used to assist industry counsel in
the joint defense of pending or anticipated

litigation.
PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018086/2018087

TYPE: LT
DATE: 12/29/66
AUTHOR: Moen, R. for Brodsky G.
RECIPIENT: Denniston, J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant regarding the
information retrieval system to be used to
assist industry counsel in the joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 18548.1 - 18548.11
MINN NUMBERS: LG 2018091/2018093

TYPE: LT
DATE: 1/17/67
AUTHOR: Brodsky, G.
RECIPIENT: Denniston, J.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Brodsky, Executive Director
of International Information Inc., to Denniston,
counsel for Liggett and other tobacco companies,
regarding the information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.
PRIV C
CATEGORY:
SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018094/2018102

TYPE: LT
DATE: 5/1/67
AUTHOR: Denniston, J.
RECIPIENT: Brown, J.; Haas, F.;
Hetsko, C.; Ramm, A.;
Smith, P.; Yeaman, A.;
Colby; Cooke; Decker,
F.; Hardy, D.;
Holtzman, A.; Jacob, E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas,
attorney Decker outside counsel for Liggett, and
counsel for certain cigarette manufacturers
regarding the information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.
PRIV A; C
CATEGORY:
SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018105/2018111

TYPE: LT
DATE: 3/21/67
AUTHOR: O'Shea, S.
RECIPIENT: Denniston, J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant regarding the
information retrieval system to be used to
assist industry counsel in the joint defense of
pending or anticipated litigation..

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018123/2018127

TYPE: LT
DATE: 12/27/66
AUTHOR: Brodsky, G.
RECIPIENT: Denniston, J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant regarding the
information retrieval system to be used to
assist industry counsel in the joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018129/2018132

TYPE: LT
DATE: 12/19/66
AUTHOR: Austern, H.
RECIPIENT: Haas, F., Hetsko, C.,
Ramm, H., Smith, P.,
Yeaman, A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Austern, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
regarding the information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018139/2018233

TYPE: OT
DATE:
AUTHOR:
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD

DESCRIPTION: Memorandum prepared for The Tobacco Institute by consultant retained to create an information retrieval system to be used to assist industry counsel in the joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018234/2018235

TYPE: LT
DATE: 6/29/67
AUTHOR: O'Shea, S.
RECIPIENT: Covington & Burling

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant to Covington & Burling, outside counsel for Liggett and certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publicly available scientific research distributed within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -

MINN NUMBERS: LG 2018238/2018296

TYPE: OT
DATE:
AUTHOR: IS&R
RECIPIENT: Tobacco Institute

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by consultant retained to
create an information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018297/2018354

TYPE: OT
DATE: 12/8/66
AUTHOR: IS&R
RECIPIENT: Covington & Burling

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Proposal prepared by consultant retained to
create an information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018355/2018372

TYPE: OT
DATE: 10/28/66
AUTHOR: IS &R
RECIPIENT: Tobacco Institute

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Proposal prepared by consultant retained to
create an information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018373/2018406

TYPE: OT
DATE: 10/24/66
AUTHOR: IS& R
RECIPIENT: Tobacco Institute

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Proposal prepared by consultant retained to
create an information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0 -
MINN NUMBERS: LG 2018407/2018464

TYPE: OT
DATE:
AUTHOR: IS& R
RECIPIENT: Tobacco Institute

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by consultant retained to
create an information retrieval system to be
used to assist industry counsel in the joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 94971 - 94979
MINN NUMBERS: LG 2018737/2018745

TYPE: NO
DATE: 10/26/83
AUTHOR: Greer, J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett's general counsel
concerning a meeting of general counsel for the
cigarette manufacturers which contains the
thoughts and impressions of industry counsel
regarding pending legislative and regulatory
issues impacting on the joint defense of pending
or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 4Y; 8; 10

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 0 -

MINN NUMBERS: LG 2018797/2018801

TYPE: NO

DATE: 12/8/83

AUTHOR: Murray, J.

RECIPIENT:

REQ NUMBER: 1 RFP 4

PRIVILEGE: AC; WP; JD

DESCRIPTION: Handwritten notes of Liggett in-house counsel Murray of meeting of industry counsel of several tobacco companies reflecting the thoughts and impressions of counsel regarding scientific research, proposed product liability legislation and pending litigation and relating legal advice provided by industry counsel for certain cigarette manufacturers regarding same within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 122594 - 122594

MINN NUMBERS: LG 2018840/2018840

TYPE: LT

DATE: 1/11/84

AUTHOR: Stevens, A.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Lorillard in-house counsel
Stevens to counsel for several tobacco companies
providing the proposed agenda for an upcoming
meeting of industry counsel to discuss matters
within a joint defense of pending or anticipated
litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10; 11
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 122602 - 122603
MINN NUMBERS: LG 2018841/2018842

TYPE: IM
DATE: 12/29/83
AUTHOR: Stevens, A.; AO: LOR
RECIPIENT: Chapin; Greer;
Holtzman; Pepples;
Witt; Chilcote;
Kornegay; Shinn;
Temko; cc: Cherry, J.;
cc: Henson, A.; cc:
Jacob, E.; cc: Murray,
J.; cc: Rupp, J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Lorillard in-house counsel
Stevens to Liggett in-house counsel Greer and
Murray and counsel for certain cigarette
manufacturers providing the proposed agenda for
an upcoming meeting of industry counsel to
discuss matters within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10; 11

CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 17271 - 17271
MINN NUMBERS: LG 2018849/2018849

TYPE: IM
DATE: 1/11/67
AUTHOR: Jacob, E.
RECIPIENT: Haas, F., Hetsko, C.,
Ramm, H., Smith, P.,
Yeaman, A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Jacob, outside counsel for
several tobacco companies, to the in-house
counsel to several tobacco companies, including
Liggett counsel Haas, regarding expenditures for
research to assist in the joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 18924 - 18928
MINN NUMBERS: LG 2019000/2019009

TYPE: LT
DATE: 12/15/66
AUTHOR: Brodsky, G.
RECIPIENT: Covington & Burling

REQ NUMBER: 1 RFP 4, 11
PRIVILEGE: WP; JD

DESCRIPTION: Correspondence from Brodsky, Executive Director of International Information Inc., to Covington & Burling, counsel for Liggett and other tobacco companies regarding the information retrieval system to be used to assist industry counsel in the joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 96332 - 96333
MINN NUMBERS: LG 2019155/2019156

TYPE: LT
DATE: 12/18/78
AUTHOR: Holtzman, A.
RECIPIENT: Crohn, Stevens,
Pepples, Henson,
Greer, Topol, Rupp,
London, Kornegay,
Panzer, Shinn, Jacob,
Finnegan

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence between Philip Morris counsel Holtzman to counsel for several tobacco companies, including Liggett in-house counsel Greer, which reflects the thoughts and mental impressions of counsel concerning an upcoming meeting between those attorneys to discuss matters within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 99372 - 99372
MINN NUMBERS: LG 2019157/2019157

TYPE: AG
DATE: 4/8/81
AUTHOR:
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Agenda concerning meeting of counsel of several tobacco companies, including counsel for Liggett, reflecting the thoughts and mental impressions of counsel within a joint defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 100431 - 100439
MINN NUMBERS: LG 2019161/2019169

TYPE: IM
DATE: 4/7/83
AUTHOR: Murray, J.
RECIPIENT: Dey, K.; Greer, J.;
Hooker, R.;
Seidensticker, R.

REQ NUMBER: 1 RFP 4, 10, 11, 130,
135
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Murray, in-house counsel for Liggett, to Liggett in-house counsel Greer and other Liggett executives, regarding a meeting between counsel for several tobacco companies, including Liggett, that reflects the

thoughts and mental impressions of industry
counsel with respect to matters within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 4Z; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 118988 - 118989
MINN NUMBERS: LG 2019184/2019185

TYPE: LT
DATE: 7/28/83
AUTHOR: Decker, F.; Shook;
Hardy; AO W&S
RECIPIENT: Greer, J.; Murray, J.;
RO LIG; cc: Hooker, R.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Decker to Liggett in-house counsel Greer
conveying legal advice and reflecting the
thoughts and mental impressions of industry
counsel with respect to matters within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 6; 7; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 135911 - 135913
MINN NUMBERS: LG 2019207/2019209

TYPE: LT
DATE: 4/22/77
AUTHOR: Hoel, D.
RECIPIENT: Greet J., Hetsko C.,
Pepples E., Roemer H.,
Stevens A.,
Ahrensfield, T.; cc:
Crohn, M.; Holtzman,
A.; Pollack L.; Brown,
J.; Jacob, E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hoel, outside counsel for
Liggett and other tobacco companies, to in-house
counsel for several tobacco companies, including
Liggett in-house counsel Greer, providing legal
advice and the thoughts and mental impressions
of counsel regarding consultants to assist
counsel in the rendition of legal advice, within
a joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 23342 - 23349
MINN NUMBERS: LG 2019252/2019259

TYPE: LT
DATE: 10/1/68
AUTHOR:
RECIPIENT: The Honorable
Commissioners

REQ NUMBER: 1 RFP 4, 37, 115
PRIVILEGE: AC; WP; JD
DESCRIPTION: Draft letter to F.T.C. prepared by outside
counsel to Liggett and certain other tobacco
companies reflecting the thoughts and mental
impressions of counsel regarding governmental
regulation of tobacco within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 2; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 27638 - 27638
MINN NUMBERS: LG 2019280/2019280

TYPE: LT
DATE: 9/18/68
AUTHOR: Yeaman, A.; AO B&W
RECIPIENT: Haas, F.; Smith

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Yeaman
to Liggett in-house counsel Haas and Philip
Morris in-house counsel Smith reflecting the
thoughts and mental impressions of counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27639 - 27639
MINN NUMBERS: LG 2019281/2019281

TYPE: LT
DATE: 9/9/68
AUTHOR: Ramm, H.; AO RJR
RECIPIENT: Yeaman, A.; RO B&W

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from RJR in-house counsel Ramm to
B&W in-house counsel Yeaman reflecting the
thoughts and mental impressions of counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.
PRIV C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27640 - 27641
MINN NUMBERS: LG 2019282/2019283

TYPE: LT
DATE: 9/5/68
AUTHOR: Yeaman, A.; AO B&W
RECIPIENT: Haas, F.; Ramm, H.;
Smith

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Yeaman
to counsel for several tobacco companies,
including Liggett in-house counsel Haas,
reflecting the thoughts and mental impressions
of counsel regarding scientific research within
a joint defense of pending or anticipated
litigation.
PRIV C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27651 - 27652
MINN NUMBERS: LG 2019284/2019285

TYPE: LT
DATE: 6/4/68
AUTHOR: Hardy, D.; AO Shook
HOM&B
RECIPIENT: Kensler, C.; RO ADL

REQ NUMBER: 1 RFP 4, 37, 124
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman, Mitchell & Bacon, to Kensler, A.D. Little Inc., consultant retained by counsel to provide assistance and information for the rendition of legal advice, requesting information and reflecting the thoughts and mental impressions of counsel regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17265 - 17265
MINN NUMBERS: LG 2019288/2019288

TYPE: LT
DATE: 2/12/68
AUTHOR: Hardy, D.
RECIPIENT: Haas, F., Hetsko, C.,
Ramm, H., Smith, Pl,
Yeaman, A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman, Mitchell & Bacon, outside counsel for Liggett and certain other tobacco companies, to counsel for several tobacco companies, including Liggett in-house counsel Haas, reflecting the thoughts and mental impressions of counsel regarding

scientific research within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27665 - 27667
MINN NUMBERS: LG 2019362/2019364

TYPE: LT
DATE: 4/5/68
AUTHOR: Miller, I.; AO ADL
RECIPIENT: Haas, F.; RO LIG

REQ NUMBER: 1 RFP 4, 37, 124
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Miller, A.D. Little, Inc.,
consultant retained by counsel to provide
assistance and information for the rendition of
legal advice, to Liggett in-house counsel Haas,
providing information requested by counsel and
reflecting the thoughts and mental impressions
of counsel regarding scientific research within
a joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27663 - 27663
MINN NUMBERS: LG 2019365/2019365

TYPE: LT
DATE: 4/8/68
AUTHOR: Haas, F.; AO LIG
RECIPIENT: Hetsko, Creighton.;
Ramm, H.; Smith, P.;
Yeaman, A.; cc:
Clements, E.; cc:
Cohn, D.; cc: Hardy,
D.; cc: Holtzman, A.;
cc: Jacob, E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to in-house counsel for several other
tobacco companies reflecting the thoughts and
mental impressions of counsel regarding
scientific research within a joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27653 - 27653
MINN NUMBERS: LG 2019378/2019378

TYPE: LT
DATE: 4/19/68
AUTHOR: Haas, F.; AO LIG
RECIPIENT: Yeaman, A.; RO B&W

REQ NUMBER: 1 RFP 4, 37, 124
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to B&W in-house counsel Yeaman reflecting
the thoughts and mental impressions of counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27654 - 27654
MINN NUMBERS: LG 2019379/2019379

TYPE: LT
DATE: 4/12/68
AUTHOR: Yeaman, A.; AO B&W
RECIPIENT: Haas, F.; RO LIG

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from B&W in-house counsel Yeaman
to Liggett in-house counsel Haas reflecting the
thoughts and mental impressions of counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27655 - 27662
MINN NUMBERS: LG 2019380/2019387

TYPE: LT
DATE: 4/24/68
AUTHOR: Miller, I.; AO ADL
RECIPIENT: Hardy, D.; RO Shook
HOM&B; cc: Jacob, E.;
cc: Haas, F.

REQ NUMBER: 1 RFP 4, 37, 124
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Miller, A.D. Little, Inc.,
consultant retained by counsel to provide

assistance and information for the rendition of legal advice, to Hardy, Shook, Hardy, Ottman, Mitchell & Bacon, outside counsel for Liggett and certain other tobacco companies, conveying information requested by counsel for the rendition of legal advice and reflecting the thoughts and mental impressions of counsel regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 35083 - 35086
MINN NUMBERS: LG 2019388/2019391

TYPE: LT
DATE: 3/18/69
AUTHOR: Covington & Burling
(Inferred)
RECIPIENT: Moss

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Draft letter appears to have been prepared by Covington & Burling, outside counsel for Liggett and certain other tobacco companies, to U.S. Senator Moss reflecting the thoughts and mental impressions of counsel regarding governmental testing and regulation of tobacco products within a joint defense of pending or anticipated litigation.

PRIV B; C
CATEGORY:

SUBJ 2; 5; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 38521 - 38522
MINN NUMBERS: LG 2019392/2019393

TYPE: LT
DATE: 2/12/69
AUTHOR: Hardy, D.
RECIPIENT: Clements, E., Haas,
F., Ramm, H., Smith,
P., Yeaman, A.; cc:
Krash, A., Austern, H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman,
Mitchell & Bacon, outside counsel for Liggett
and certain other tobacco companies, to counsel
for several tobacco companies, including Liggett
in-house counsel Haas reflecting the thoughts
and mental impressions of counsel regarding
scientific research and governmental regulation
of tobacco products within a joint defense of
pending or anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 38999 - 39000
MINN NUMBERS: LG 2019442/2019442

TYPE: LT
DATE: 04/12/69
AUTHOR: Krash A.
RECIPIENT: Bantle L.; Cullman J.;
Finch E.; Forsyth A.;
Galloway A.; George
B.; Harrington M.;
Wood J.; Walker R.;
Yellen M.

REQ NUMBER: 1RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Krash, Arnold & Porter,
outside counsel for Philip Morris, to executives
for several tobacco companies, including Liggett
executive Harrington, reflecting the thoughts
and mental impressions of counsel regarding
governmental regulation of tobacco products
within a joint defense of pending or anticipated
litigation, with handwritten note forwarding the
letter to Liggett in-house counsel Haas for the
provision of legal advice regarding the same
PRIV B; C
CATEGORY:
SUBJ 5; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 39459 - 39461
MINN NUMBERS: LG 2019472/2019474

TYPE: LT
DATE: 9/26/69
AUTHOR: Wakeham, H.
RECIPIENT: Austern, H.; cc:
Harlow, E., Spears,
A., Bates, W.,
Sanford, R., Nielson,
E., Bennett, W.,
Gregory, N., Gregory,
N., Wood, J., Senkus, M

REQ NUMBER: 1 RFP 4, 37, 128, 2
RFP 2, 3
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Philip Morris executive
Wakeham to Austern, Covington & Burling, outside
counsel for Liggett and certain other tobacco
companies (copies to executives from several
tobacco companies including Liggett Research
Director Bates) requesting legal advice
conveying information requested by counsel for
the rendition of legal advice, and reflecting
the thoughts and mental impressions of counsel
regarding scientific research within a joint

defense of pending or anticipated litigation.
PRIV C
CATEGORY:

SUBJ 3; 6
CATEGORY:
DOCUMENT LOCATION: 6

LIG NUMBERS: 17416 - 17416
MINN NUMBERS: LG 2019645/2019645

TYPE: LT
DATE: 11/20/73
AUTHOR: Kornegay, H.
RECIPIENT: Haas, F.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from T.I. executive Kornegay to
Liggett in-house counsel Haas requesting legal
advice and reflecting the thoughts and mental
impressions of industry counsel regarding the
funding of scientific research within a joint
defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 18306-18315
MINN NUMBERS: LG 2020772/2020782

TYPE: LT
DATE: 4/14/70
AUTHOR: O'Shea S.
RECIPIENT: Haas F.; Hetsko C.;

Ramm H.; Smith P.;
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from industry consultant O'Shea
to Liggett in-house counsel Haas and counsel for
certain cigarette manufacturers providing
information regarding the compilation of
publically available scientific research to
assist industry counsel within a joint defense
of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 18316-18327
MINN NUMBERS: LG 2020783/2020795

TYPE: LT
DATE: 4/13/70
AUTHOR: O'Shea S.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from industry consultant O'Shea
to Liggett in-house counsel Haas providing
information regarding the compilation of
publically available scientific research to
assist industry counsel within a joint defense
of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 18451-18452
MINN NUMBERS: LG 2020913/2020914

TYPE: LT
DATE: 2/21/68
AUTHOR: Colby F.; Benbow S.
RECIPIENT: Austern H. cc: Ramm
H.; O'Shea S.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from RJR executives Colby and
Benbow to attorney Austern, outside counsel for
Liggett, providing information regarding the
compilation of publically available scientific
research to assist industry counsel within a
joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 33468-33469
MINN NUMBERS: LG 2021346/2021347

TYPE: LT
DATE: 11/26/68
AUTHOR: Hardy D.
RECIPIENT: Grant P.; Haas f.;
Hetsko C.; Ramm H.;
Smith P.; Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and

impressions of industry counsel regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 33605-33692
MINN NUMBERS: LG 2021356/2021443

TYPE: LT
DATE: 8/10/67
AUTHOR: Hardy D.
RECIPIENT: Haas F.; Hetsko C.;
Smith P.; Ramm H.;
Yeaman A. cc:
Clements E.; Austern
H.; Krash A.; DeHart
E.; Thompson C.; Ad
Hoc Committee

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorneys Hardy, counsel for certain cigarette manufacturers to Liggett in-house counsel Haas and counsel for certain cigarette manufacturers providing legal advice and requesting assistance of industry counsel regarding enclosed draft correspondence within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 104718-0104718
MINN NUMBERS: LG 2021550/2021550

TYPE: IM
DATE: 1/15/75
AUTHOR: Haas;
RECIPIENT: Sloat;

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executive Sloat
reflecting the thoughts and impressions of
industry counsel regarding scientific research
relating to smoking and health.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 98567-98584
MINN NUMBERS: LG 2021636/2021653

TYPE: NO
DATE: 12/4/75
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC, WP, JD
DESCRIPTION: Notes of Liggett in-house counsel Greer
concerning meeting of Committee of Counsel and
reflecting the thoughts and impressions of
Liggett counsel and counsel for certain
cigarette manufacturers regarding FTC
regulations relating to advertising and
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 121692-121692
MINN NUMBERS: LG 2021685/2021685

TYPE: IM
DATE: 12/31/75
AUTHOR: Greer J.
RECIPIENT: Kersey R. cc: Hill J.

REQ NUMBER: 1 RFP 4, 133
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Greer to Liggett executive Kersey (copy
to Liggett in-house counsel Hill) providing
legal advice and the thoughts and impressions of
counsel regarding draft industry response
concerning public statements on scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 98411-98412
MINN NUMBERS: LG 2021826/2021827

TYPE: LT
DATE: 3/26/76
AUTHOR: Stevens A.
RECIPIENT: Greer, Hetsko,
Holtzman, Pepples,
Roemer CC: Ahrensfield,

Crohn, Henson, Hardy

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC, JD
DESCRIPTION: Correspondence from attorney Stevens, in-house
counsel for Lorillard, to attorneys Greer,
Hetsko, Holtzman, Pepples and Roemer, Liggett
counsel and counsel for certain cigarette
manufacturers (copies to outside counsel for
cigarette manufacturers), reflecting the
thoughts and impressions of industry counsel
regarding an upcoming meeting of counsel
concerning FTC regulations relating to
advertising, and scientific research issues,
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 98643-98643
MINN NUMBERS: LG 2021932/2021932

TYPE: AG
DATE: 5/13/76
AUTHOR:
RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC, WP, JD
DESCRIPTION: Suggested discussion points for a meeting of
industry counsel reflecting their thoughts and
impressions regarding issues of smoking and
health, scientific research and legislative
hearings, within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 27697-0027698
MINN NUMBERS: LG 2021983/2021984

TYPE: LT
DATE: 11/1/66
AUTHOR: DeHart E.;AO
RECIPIENT: Hardy D.;RO SHOOK
HOM&B;CC Kensler C.;CC
Haas F.;

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from DeHart, Hill & Knowlton,
consultant retained by industry counsel to
provide assistance and information for the
rendition of legal advice, to D. Hardy, Shook,
Hardy & Bacon, outside counsel for Liggett and
certain other tobacco companies providing
information requested by and reflecting the
thoughts and mental impressions of industry
counsel regarding scientific research issues
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27722-0027722
MINN NUMBERS: LG 2021986/2021986

TYPE: IM
DATE: 9/4/64
AUTHOR: Etzler C.;AO
RECIPIENT: White;CC Morgenthaler;

REQ NUMBER: 1 RFP 4, 124
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett executive
Etzler to Liggett executive White (copy to
Liggett in-house counsel Morgenthaler)
discussing the legal advice of Liggett in-house
counsel Morgenthaler regarding contract issues
within a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 35074-0035074
MINN NUMBERS: LG 2021988/2021988

TYPE: LT
DATE: 12/7/66
AUTHOR: Bates W.;AO LIG;
RECIPIENT: Haas F.;RO LIG;

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett Research
Director Bates to Liggett in-house counsel Haas
conveying information requested by counsel for
the rendition of legal advice regarding
governmental regulation of tobacco products
within a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 3; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 38287-38290
MINN NUMBERS: LG 2021989/2021992

TYPE: LT
DATE: 9/26/66
AUTHOR: DeHart E.
RECIPIENT: Haas, Hetsko, Ramm,
Smith, Yeaman, CC:
CLEMENTS E., Austern
H., Krash A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from DeHart, Hill & Knowlton,
consultant retained by industry counsel to
provide assistance and information for the
rendition of legal advice, to counsel for
several tobacco companies, including Liggett
in-house counsel Haas, with attached memorandum
prepared by Hill & Knowlton , with each document
providing information requested by and
reflecting the thoughts and mental impressions
of industry counsel regarding smoking and health
issues within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 17267-17267
MINN NUMBERS: LG 2022015/2022015

TYPE: LT
DATE: 2/17/67
AUTHOR: Hardy D.
RECIPIENT: Haas F., Hetsko C.,
Ramm H., Smith P.,
Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman,
Mitchell & Bacon, outside counsel for Liggett
and certain other tobacco companies, to counsel
for several tobacco companies, including Liggett
in-house counsel Haas, reflecting the thoughts
and mental impressions of industry counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17266-17266
MINN NUMBERS: LG 2022016/2022016

TYPE: LT
DATE: 2/27/67
AUTHOR: Hardy D.
RECIPIENT: Haas F., Hetsko C.,
Ramm H., Smith P.,
Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman,
Mitchell & Bacon, outside counsel for Liggett
and certain other tobacco companies, to counsel
for several tobacco companies, including Liggett
in-house counsel Haas, reflecting the thoughts
and mental impressions of industry counsel
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 27686-0027687
MINN NUMBERS: LG 2022017/2022018

TYPE: LT
DATE: 1/27/67
AUTHOR: Hardy D.;AO SHOOK
HOM&B;
RECIPIENT: Haas F.;Hetsko C.;Ramm
H.;Smith P.;Yeaman A.;

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Hardy, Shook, Hardy, Ottman,
Mitchell & Bacon, outside counsel for Liggett
and certain other tobacco companies, to counsel
for several tobacco companies, including Liggett
in-house counsel Haas, reflecting the thoughts
and mental impressions of industry counsel
regarding scientific issues within a joint
defense of pending or anticipated litigation.
PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 35064-0035064
MINN NUMBERS: LG 2022021/2022021

TYPE: LT
DATE: 3/23/67
AUTHOR: Mold J.;AO LIG;
RECIPIENT: Haas F.;RO LIG;CC
Bates W.;CC Samfield
M.;

REQ NUMBER: 1 RFP 4, 134
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett Assistant
Research Director Mold to Liggett in-house
counsel Haas (copies to Liggett executives Bates

and Samfield) conveying information requested by
counsel for the rendition of legal advice
regarding scientific research within a joint
defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 39626-39633
MINN NUMBERS: LG 2022032/2022042

TYPE: RP
DATE: 5/4/67
AUTHOR: NEILSON E.
RECIPIENT: RAMM H., CC: BRIGHT W.

REQ NUMBER: 1 RFP 4, 37, 41, 2 RFP
2

PRIVILEGE: JD
DESCRIPTION: Internal memorandum from RJR research executive
Nielson to RJR in-house counsel Ramm (copy to
RJR research executive Bright) conveying
information requested by industry counsel for
the rendition of legal advice and reflecting the
thoughts and mental impressions of industry
counsel regarding scientific research within a
joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 26873-26874
MINN NUMBERS: LG 2022043/2022044

TYPE: LT
DATE: 5/16/67
AUTHOR: Clements E.
RECIPIENT: Haas F.

REQ NUMBER: 1 RFP 4, 37, 61
PRIVILEGE: JD
DESCRIPTION: Correspondence from T.I. executive Clements to Liggett in-house counsel Haas conveying information requested by industry industry counsel for the rendition of legal advice and reflecting the thoughts and mental impressions of industry counsel regarding governmental regulation and scientific issues within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 38459-38460
MINN NUMBERS: LG 2022058/2022059

TYPE: IM
DATE: 6/2/67
AUTHOR: Austern T.
RECIPIENT:

REQ NUMBER: 1 RFP 4, 102, 104
PRIVILEGE: WP; JD
DESCRIPTION: Internal memorandum prepared by outside counsel for Liggett and certain other tobacco companies, reflecting the thoughts and mental impressions of industry counsel regarding governmental regulation of advertising and labeling within a joint defense of pending or anticipated litigation.

PRIV B; C
CATEGORY:

SUBJ 7; 8

CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 38461-38462
MINN NUMBERS: LG 2022060/2022061

TYPE: LT
DATE: 6/3/67
AUTHOR: Austern T.
RECIPIENT: KRAFT J., cc:
CLEMENTS E., Ramm H.,
Haas F.

REQ NUMBER: 1 RFP 4, 102, 104
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Austern, Covington &
Burling, outside counsel for Liggett and certain
other tobacco companies, to Kraft, John F.
Kraft, Inc., consultant retained by industry
counsel to provide assistance and information
for the rendition of legal advice, (copies to
T.I. executive Clements, Liggett in-house
counsel Haas, and RJR in-house counsel Ramm)
reflecting the thoughts and mental impressions
of industry counsel regarding governmental
regulation of advertising and labeling within a
joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 38441-38443
MINN NUMBERS: LG 2022092/2022094

TYPE: LT
DATE: 6/21/67
AUTHOR: KRAFT J.
RECIPIENT: Austern T., cc:
CLEMENTS E.

REQ NUMBER: 1 RFP 4, 102, 104
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Kraft, John F. Kraft, Inc.,
consultant retained by industry counsel to
provide assistance and information for the
rendition of legal advice, to Austern, Covington
& Burling, outside counsel for Liggett and
certain other tobacco companies, conveying
information requested by and reflecting the
thoughts and mental impressions of industry
counsel regarding governmental regulation of
labeling and advertising within a joint defense
of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 38437-38440
MINN NUMBERS: LG 2022097/2022100

TYPE: LT
DATE: 6/24/67
AUTHOR:
RECIPIENT: Ramm H., Haas F., cc:
CLEMENTS E.

REQ NUMBER: 1 RFP 4, 37, 102, 104
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Covington & Burling, outside
counsel for Liggett and certain other tobacco
companies, to Liggett in-house counsel Haas and
RJR in-house counsel Ramm (copy to T.I.
executive Clements) reflecting the thoughts and
mental impressions of industry counsel regarding
governmental regulation of advertising and
labeling within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 38422-38424
MINN NUMBERS: LG 2022115/2022118

TYPE: LT
DATE: 7/13/67
AUTHOR: KRAFT J.
RECIPIENT: Austern H., cc:
CLEMENTS E.

REQ NUMBER: 1 RFP 4, 102
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Kraft, John F. Kraft, Inc.,
consultant retained by industry counsel to
provide assistance and information for the
rendition of legal advice, to Austern, Covington
& Burling, outside counsel for Liggett and
certain other tobacco companies, conveying
information requested by industry counsel
regarding governmental regulation of advertising
and labeling within a joint defense of pending
or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 16600-16600
MINN NUMBERS: LG 2022130/2022130

TYPE: LT
DATE: 8/2/67
AUTHOR: Haas F.
RECIPIENT: Hetsko C., Ramm H.,
Smith P., Yeaman A.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to counsel for several tobacco companies,
reflecting the thoughts and mental impressions
of industry counsel regarding litigation
strategy and scientific research within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 34529.55-34952.55
MINN NUMBERS: LG 2022142/2022142

TYPE: LT
DATE: 9/26/67
AUTHOR: Hardy D.
RECIPIENT: Haas F., Ramm H.,
Smith P., Yeaman A.
cc: Clements E.;
Austern H.; Krash A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of industry counsel regarding
scientific research within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 36245-36246
MINN NUMBERS: LG 2022149/2022150

TYPE: IM
DATE: 12/29/67
AUTHOR: Lincoln G.
RECIPIENT: Robinson H.

REQ NUMBER: 1 RFP 4, 98
PRIVILEGE: AC; JD
DESCRIPTION: Internal memorandum from Liggett executive
Lincoln to Liggett executive Robinson discussing
information requested by counsel for the
rendition of legal advice regarding governmental
regulation of advertising within a joint defense
of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 7; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 16897-16897
MINN NUMBERS: LG 2022153/2022153

TYPE: IM
DATE: 7/6/67
AUTHOR: Hockett R.
RECIPIENT: Hardy D.

REQ NUMBER: 1 RFP 4, 34, 37, 51
PRIVILEGE: JD
DESCRIPTION: Correspondence from Hockett, C.T.R. executive,
to Hardy, Shook, Hardy, Ottman, Mitchell &

Bacon, outside counsel for Liggett and certain other tobacco companies, providing information requested by industry counsel for the rendition of legal advice and reflecting the thoughts and mental impressions of industry counsel regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 111589-0111591
MINN NUMBERS: LG 2022162/2022164

TYPE: IM
DATE: 11/28/67
AUTHOR: Haas F.
RECIPIENT: Harrington;Old;White;

REQ NUMBER: 1 RFP 4, 132, 2 RFP 2,
3

PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house counsel Haas to Liggett executives Harrington, Old, and White, conveying legal advice and reflecting the thoughts and mental impressions of industry counsel regarding scientific research and governmental regulation of tobacco products within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 111592-0111594
MINN NUMBERS: LG 2022165/2022167

TYPE: IM
DATE: 11/28/67
AUTHOR: Haas F.
RECIPIENT: Harrington;Old;White;

REQ NUMBER: 1 RFP 4, 132, 2 RFP 2,
3

PRIVILEGE: WP; AC: JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executives Harrington,
Old, and White, conveying legal advice and
reflecting the thoughts and mental impressions
of industry counsel regarding scientific
research and governmental regulation of tobacco
products within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 111629-0111630
MINN NUMBERS: LG 2022168/2022169

TYPE: RP
DATE: 1/24/67
AUTHOR: Haas F.
RECIPIENT: Harrington;CC Old;CC
Anderson;CC Moore;

REQ NUMBER: 1 RFP 4, 45, 132
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett executive Harrington
(copies to Liggett executives Old, Anderson, and
Moore) conveying legal advice and reflecting the
thoughts and mental impressions of industry
counsel regarding scientific research within a
joint defense of pending or anticipated

litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y; 6; 10
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 110675-0110675
MINN NUMBERS: LG 2022189/2022189

TYPE: LT
DATE: 7/9/54
AUTHOR: CLARKE A.;
RECIPIENT: Horan F.;CC CHANDLER
P.;

REQ NUMBER: 1 RFP 4, 11, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to Liggett
General Counsel Horan regarding Liggett's
participation in a system to provide publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110673-0110673
MINN NUMBERS: LG 2022191/2022191

TYPE: LT
DATE: 7/21/54

AUTHOR: CLARKE A.;
RECIPIENT: Horan F.;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to Liggett
General Counsel Horan regarding Liggett's
participation in a system to provide publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110659-0110659
MINN NUMBERS: LG 2022193/2022193

TYPE: LT
DATE: 8/30/54
AUTHOR: Clarke A.
RECIPIENT: Horan F.;

REQ NUMBER: 1 RFP 4, 11, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to Liggett
General Counsel Horan enclosing publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110632-0110632
MINN NUMBERS: LG 2022195/2022195

TYPE: LT
DATE: 10/13/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 11, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110622-0110622
MINN NUMBERS: LG 2022196/2022196

TYPE: LT
DATE: 10/22/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C

CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110607-0110607
MINN NUMBERS: LG 2022197/2022197

TYPE: LT
DATE: 10/27/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to
in-house and outside litigation counsel for
cigarette manufacturers enclosing publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110613-0110613
MINN NUMBERS: LG 2022198/2022198

TYPE: LT
DATE: 11/1/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 110577-0110577
MINN NUMBERS: LG 2022199/2022199

TYPE: LT
DATE: 11/1/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 108333-108333
MINN NUMBERS: LG 2022262/2022262

TYPE: LT
DATE: 2/7/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to counsel
for certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding scientific research
distributed within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 108387-108387
MINN NUMBERS: LG 2022263/2022263

TYPE: LT
DATE: 9/26/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to counsel
for certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding scientific research
distributed within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:

DOCUMENT LOCATION: 3

LIG NUMBERS: 108472-108472
MINN NUMBERS: LG 2022264/2022264

TYPE: LT
DATE: 6/10/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to counsel
for certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding advertising and
marketing issues distributed within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 108481-108481
MINN NUMBERS: LG 2022265/2022265

TYPE: LT
DATE: 6/9/55
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to counsel
for certain cigarette manufacturers providing
information to assist counsel in the rendition

of legal advice regarding scientific research distributed within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 110552-0110552
MINN NUMBERS: LG 2022279/2022279

TYPE: LT
DATE: 12/3/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 110553-0110553
MINN NUMBERS: LG 2022280/2022280

TYPE: LT

DATE: 12/2/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to
in-house and outside litigation counsel for
cigarette manufacturers enclosing publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 110564-0110565
MINN NUMBERS: LG 2022281/2022282

TYPE: LT
DATE: 11/30/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel
(Inferred)

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke which
appears to have been sent to in-house and
outside litigation counsel for cigarette
manufacturers regarding scientific information
provided at the request of counsel to assist in
the rendition of legal advice within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3;
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 110566-0110566
MINN NUMBERS: LG 2022283/2022283

TYPE: LT
DATE: 11/30/54
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 110576-0110576
MINN NUMBERS: LG 2022286/2022286

TYPE: LT
DATE: 11/3/54
AUTHOR: CLARKE A.;
RECIPIENT: LEGAL COUNSEL;

REQ NUMBER: 1 RFP 4, 11, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal

advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 108264-0108264
MINN NUMBERS: LG 2022310/2022310

TYPE: LT
DATE: 5/2/56
AUTHOR: Clarke A.
RECIPIENT: Horan F.;

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to in-house and outside litigation counsel for cigarette manufacturers enclosing publicly available research materials compiled at request of counsel to assist in rendition of legal advice within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 108262-0108263
MINN NUMBERS: LG 2022311/2022312

TYPE: LT
DATE: 5/10/56

AUTHOR: Clarke A.
RECIPIENT: Horan F.; cc:
Whiteside G.; Webster
B.; Perkins; Hewitt
J.; Chandler P.; Ramm
H.

REQ NUMBER: 1 RFP 4, 41, 131
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to
in-house and outside litigation counsel for
cigarette manufacturers enclosing publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 108261-0108261
MINN NUMBERS: LG 2022313/2022313

TYPE: IM
DATE: 5/10/56
AUTHOR: Clarke A.
RECIPIENT: Legal Counsel

REQ NUMBER: 1 RFP 4, 41
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from consultant Clarke to
in-house and outside litigation counsel for
cigarette manufacturers enclosing publicly
available research materials compiled at request
of counsel to assist in rendition of legal
advice within a joint defense of pending or
anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 94608-94628
MINN NUMBERS: LG 2022362/2022382

TYPE: LT
DATE: 8/28/79
AUTHOR: Hardy D.
RECIPIENT: Ahrensfield T.; Crohn
M.; Greer J.; Henson
A.; Pepples E.;
Stevens A. cc:
Bryant D.; Holtzman
A.; Brown J.; Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Hardy, outside
counsel for Liggett and other cigarette
manufacturers, to in-house counsel for Liggett
and other cigarette manufacturers (copies to
outside counsel) discussing and enclosing
material to assist counsel in the rendition of
legal advice regarding research issues, and
distributed within a joint defense of pending or
anticipated litigation.
PRIV A; B; C
CATEGORY:
SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 98885-98885
MINN NUMBERS: LG 2022554/2022554

TYPE: LT
DATE: 6/20/75
AUTHOR: Greer J.

RECIPIENT: Ehringhaus J. CC:
Kornegay H., Hill J.,
Haas F., Rechholtz R.,
Robinson H.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC, WP, JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to attorney Ehringhaus, outside counsel
for certain cigarette manufacturers (copies to
Tobacco Institute executive Kornegay, Liggett
in-house counsel Hill and Haas and Liggett
executives Rechholtz and Robinson) concerning a
meeting of the Committee of Counsel and
providing legal advice and the thoughts and
mental impressions of industry counsel regarding
advertising issues, within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 98888-98888
MINN NUMBERS: LG 2022555/2022555

TYPE: IM
DATE: 6/6/75
AUTHOR: Rechholtz R.
RECIPIENT: Robinson C. CC: Greer
J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC, JD
DESCRIPTION: Internal memorandum from Liggett executive
Rechholtz to Liggett executive Robinson (copy to
in-house counsel Greer) requesting information
to assist counsel in the rendition of legal
advice regarding advertising issues, within a
joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 5; 8
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 33429-0033429
MINN NUMBERS: LG 2022690/2022690

TYPE: IM
DATE: 8/4/69
AUTHOR: Cohen H.
RECIPIENT: IS&R System Users

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from CTR executive Cohen to
counsel for certain cigarette manufacturers
providing information for use in the rendition
of legal advice regarding publication of
scientific research within a joint defense of
pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 86625-86227
MINN NUMBERS: LG 2022762/2022764

TYPE: IM
DATE: 2/26/71
AUTHOR: Haas F.
RECIPIENT: Harrington M. cc:
McAllister K.; Greer
J.; Gross

REQ NUMBER: 1 RFP 4, 37, 132

PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house counsel Haas to Liggett executive Harrington (copies to Liggett in-house counsel Greer and Liggett executives) providing legal advice and the thoughts and impressions of industry counsel and relating legal advice from counsel for certain cigarette manufacturers regarding government regulations on labeling within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 87439-87439
MINN NUMBERS: LG 2022844/2022849

TYPE: IM
DATE: 5/23/78
AUTHOR: Greer J.
RECIPIENT: Dey K.; Hooker R.;
Provost D.;
Seidensticker R.

REQ NUMBER: 1 RFP 4, 37, 130, 135
PRIVILEGE: WP; AC; JD
DESCRIPTION: Internal memorandum from Liggett in-house counsel Greer to Liggett executives Dey, Hooker, Provost and Seidensticker with handwritten margin notes providing legal advice and relating legal advice provided by counsel for certain cigarette manufacturers regarding enclosed draft industry response to government statements prepared within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 5; 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 8

LIG NUMBERS: 64188-64188
MINN NUMBERS: LG 2023107/2023107

TYPE: IM
DATE: 12/31/75
AUTHOR: Greer J.
RECIPIENT: Kersey cc: Hill

REQ NUMBER: 1 RFP 4, 37, 133
PRIVILEGE: AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Greer to Liggett research director Kersey
providing legal advice and the thoughts and
impressions of industry counsel regarding press
releases relating to smoking and health issues
within a joint defense of pending or anticipated
litigation.

PRIV A
CATEGORY:

SUBJ 5
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 64277-64277
MINN NUMBERS: LG 2023110/2023110

TYPE: LT
DATE: 4/26/72
AUTHOR: Komendantov A.
RECIPIENT: Bates W.

REQ NUMBER: 1 RFP 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from manager of user service for
the Literature Retrieval Division to Liggett
research director Bates concerning compilation
of information publicly available for use within
a joint defense of pending or anticipated

smoking and health litigation.
PRIV C
CATEGORY:

SUBJ 2; 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 64785-64791
MINN NUMBERS: LG 2023171/2023177

TYPE: LT
DATE: 12/21/79
AUTHOR: Topol A.
RECIPIENT: Leake P.; Sanford R.;
Kersey R.; Schultz F.;
Seligman R.; Rodgman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Topol, counsel for
Tobacco Institute, attaching draft of report for
comment to research directors of cigarette
companies for their comment, within a joint
defense of pending or anticipated litigation
concerning "Self-Extinguishing" cigarettes.

PRIV A; B; C
CATEGORY:

SUBJ 5; 6; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 64793-64801
MINN NUMBERS: LG 2023178/2023186

TYPE: LT
DATE: 11/9/79

AUTHOR: Topol A.
RECIPIENT: Leake P.; Huges I.;
Kersey R.; Schultz F.;
Seligman R.; Rodgman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Topol, counsel for
Tobacco Institute, attaching draft of report for
comment to research directors of cigarette
companies for their comment, within a joint
defense of pending or anticipated litigation
concerning "Self-Extinguishing" cigarettes.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 5; 6; 10
CATEGORY:
DOCUMENT LOCATION: 5

LIG NUMBERS: 17749-17749
MINN NUMBERS: LG 2023419/2023419

TYPE: IM
DATE: 1/15/75
AUTHOR: Haas F.
RECIPIENT: Sloat A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC, WP, JD
DESCRIPTION: Internal memorandum from Liggett in-house
counsel Haas to Liggett president Sloat
providing legal advice and the thoughts and
impressions of counsel regarding scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17750-17751
MINN NUMBERS: LG 2023420/2023421

TYPE: LT
DATE: 1/14/75
AUTHOR: Jacob E.
RECIPIENT: Nyreen D.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett executive Nyreen providing legal advice
and the thoughts and impressions of counsel
concerning CTR Special Accounts within a joint
defense of pending or anticipated litigation.
PRIV A; B; C
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 17790-17790
MINN NUMBERS: LG 2023460/2023460

TYPE: LT
DATE: 4/13/67
AUTHOR: Jacob E.
RECIPIENT: Chandler; Cohn D.;
Holtzman A.; Johnston;
Neaher; Russell

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett outside counsel Cohn and counsel for
certain cigarette manufacturers providing legal
advice and the thoughts and impressions of
counsel regarding the funding of CTR Special

Accounts and other issues relevant to the joint
defense of pending or anticipated litigation.

PRIV A
CATEGORY:

SUBJ 4Y; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 17791-17791
MINN NUMBERS: LG 2023461/2023461

TYPE: LT
DATE: 1/11/67
AUTHOR: Jacob E.
RECIPIENT: Haas F.; Hetsko C.;
Ramm H.; Smith
P.;Yeaman A.

REQ NUMBER: 1 RFP 4, 37, 124
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett outside counsel Cohn and counsel for
certain cigarette manufacturers providing legal
advice and the thoughts and impressions of
counsel concerning the funding of scientific
research within a joint defense of pending or
anticipated litigation..

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17792-17792
MINN NUMBERS: LG 2023462/2023462

TYPE: LT
DATE: 10/26/66
AUTHOR: Haas F.
RECIPIENT: Kensler C.; Cohn D.

REQ NUMBER: 1 RFP 4, 124
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to Liggett consultant Kensler (copy to
Liggett outside counsel Cohn) requesting
information to assist in the rendition of legal
advice regarding the funding of scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 17796-17796
MINN NUMBERS: LG 2023463/2023463

TYPE: LT
DATE: 7/21/66
AUTHOR: Haas F.
RECIPIENT: Jacob E.

REQ NUMBER: 1 RFP 4, 34, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from Liggett in-house counsel
Haas to attorney Jacob, outside counsel for
certain cigarette manufacturers providing
information to assist in the rendition of legal
advice regarding the funding of scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 18474-18548
MINN NUMBERS: LG 2023471/2023480

TYPE: LT
DATE: 11/16/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;
Hetsko C.; Ramm H.;
Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett, to Liggett in-house counsel
Haas, attorney Decker, outside counsel for
Liggett and counsel for certain cigarette
manufacturers regarding the compilation of
publically available scientific research to
assist counsel within a joint defense of pending
or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Z; 3
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023481/2023489

TYPE: LT
DATE: 11/15/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;
Hetsko C.; Ramm H.;

Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas,
attorney Decker, outside counsel for Liggett,
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding the compilation
of publically available scientific research to
assist counsel in the rendition of legal advice
and enclosing memorandum relating same
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Z; 3
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023490/2023491

TYPE: LT
DATE: 11/11/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;
Hetsko C.; Ramm H.;
Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas,
attorney Decker, outside counsel for Liggett,
and counsel for certain cigarette manufacturers

providing legal advice and the thoughts and impressions of counsel regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice and enclosing correspondence relating same distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Z; 3
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023493/2023494

TYPE: LT
DATE: 11/2/67
AUTHOR: Austern T.
RECIPIENT: Haas F.; Hardy D.;
Ramm H.; Smith P.;
Yeaman A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Austern, outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Haas and counsel for certain cigarette manufacturers providing legal advice and the thoughts and impressions of counsel and enclosing correspondence regarding the compilation of publically available scientific research distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023495/2023497

TYPE: LT
DATE: 10/26/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;
Hetsko C.; Ramm H.;
Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas,
attorney Decker, outside counsel for Liggett,
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding the compilation
of publically available scientific research to
assist counsel in the rendition of legal advice
and enclosing correspondence relating same
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023498/2023500

TYPE: LT
DATE: 10/13/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;

Hetsko C.; Ramm H.;
Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas,
attorney Decker, outside counsel for Liggett,
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding the compilation
of publically available scientific research to
assist counsel in the rendition of legal advice
and enclosing correspondence relating same
distributed within a joint defense of pending or
anticipated litigation.
PRIV A; C
CATEGORY:
SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023513/2023517

TYPE: LT
DATE: 6/9/67
AUTHOR: Denniston J.
RECIPIENT: Brown J.; Haas F.;
Hetsko C.; Ramm H.;
Smith P.; Yeaman A.;
Colby; Cooke; Decker
F.; Hardy D.; Holtzman
A.; Jacob E.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Denniston, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers

providing legal advice and the thoughts and impressions of counsel and enclosing correspondence regarding the compilation of publically available scientific research distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023519/2023528

TYPE: IM
DATE: 4/28/67
AUTHOR: Decker F.
RECIPIENT: Files

REQ NUMBER: 1 RFP 4
PRIVILEGE: Ac; WP; JD
DESCRIPTION: Memorandum prepared by attorney Decker, outside counsel for Liggett, to his files relating legal advice and the thoughts and impressions of counsel regarding the compilation of publically available scientific research and relating legal advice provided by counsel for certain cigarette manufacturers regarding same within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2023529/2023545

TYPE: IM
DATE: 4/27/67
AUTHOR: Decker F.
RECIPIENT: Files

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Internal memorandum from attorney Decker, outside counsel for Liggett, to his files reflecting legal advice and the thoughts and impressions of counsel regarding the compilation of publically available scientific research and relating legal advice provided by counsel for certain cigarette manufacturers regarding same within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 53843/53844
MINN NUMBERS: LG 2023565/2023566

TYPE: LT
DATE: 4/7/67
AUTHOR: Hardy D.
RECIPIENT: Yeaman A. cc: Haas

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: WP; AC; JD
DESCRIPTION: Correspondence from attorney Hardy, outside counsel for Liggett and certain cigarette manufacturers, to attorney Yeaman, in-house counsel for the Tobacco Institute (copy to Liggett in-house counsel Haas), providing information to assist in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2023805/2023809

TYPE: OT
DATE: 1/1/67
AUTHOR: Legal Counsel
(Inferred)

RECIPIENT:

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum appears to have been prepared by
counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding scientific
research distributed within a joint defense of
pending or anticipated litigation.

PRIV A; C

CATEGORY:

SUBJ 2; 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93076-93076
MINN NUMBERS: LG 2023810/2023810

TYPE: LT
DATE: 11/23/83
AUTHOR: Jacob E.
RECIPIENT: Greer J.; Henson A.;
Holtzman A.; Murray

J.; Pepples E.;
Stevens A.; Witt S.
cc: Shinn W.; Brown J.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for
certain cigarette manufacturers (copies to
attorney Shinn, outside counsel for Liggett and
certain cigarette manufacturers and counsel for
certain cigarette manufacturers) providing
information to assist counsel in the rendition
of legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24718-24723
MINN NUMBERS: LG 2023811/2023816

TYPE: LT
DATE: 2/4/70
AUTHOR: Shinn W.
RECIPIENT: Haas F.; Hetsko C.;
Ramm H.; Smith P.;
Stevens A.; Yeaman A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93527-93527
MINN NUMBERS: LG 2023817/2023817

TYPE: LT
DATE: 2/29/80
AUTHOR: Jacob E.
RECIPIENT: Ahrensfield T.; Crohn
M.; Greer J.; Henson
A.; Pepples E.;
Stevens A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for
certain cigarette manufacturers (copies to
attorney Shinn, outside counsel for Liggett and
certain cigarette manufacturers and counsel for
certain cigarette manufacturers) providing
information to assist counsel in the rendition
of legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93418-93419
MINN NUMBERS: LG 2023818/2023819

TYPE: LT
DATE: 1/14/82
AUTHOR: Jacob E.
RECIPIENT: Ahrensfield T.; Crohn
M.; Greer J.; Henson
A.; Pepples E.;
Stevens A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for
certain cigarette manufacturers (copies to
attorney Shinn, outside counsel for Liggett and
certain cigarette manufacturers and counsel for
certain cigarette manufacturers) providing
information to assist counsel in the rendition
of legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93309-93309
MINN NUMBERS: LG 2023820/2023820

TYPE: LT
DATE: 5/28/82
AUTHOR: Jacob E.
RECIPIENT: Greer J.; Henson A.;
Holtzman A.; Pepples
E.; Stevens A.; Witt
S. cc: Shinn W.; Brown
J.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside
counsel for certain cigarette manufacturers, to
Liggett in-house counsel Greer and counsel for

certain cigarette manufacturers (copies to attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers and counsel for certain cigarette manufacturers) providing information to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 93111-93111
MINN NUMBERS: LG 2023821/2023821

TYPE: LT
DATE: 11/23/83
AUTHOR: Jacob E.
RECIPIENT: Greer J.; Henson A.;
Holtzman A.; Murray
J.; Pepples E.;
Stevens A.; Witt S.
cc: Shinn W.; Brown J

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Jacob, outside counsel for certain cigarette manufacturers, to Liggett in-house counsel Greer and counsel for certain cigarette manufacturers (copies to attorney Shinn, outside counsel for Liggett and certain cigarette manufacturers and counsel for certain cigarette manufacturers) providing information to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 24763-24764
MINN NUMBERS: LG 2023822/2023823

TYPE: LT
DATE: 9/8/69
AUTHOR: Shinn W.
RECIPIENT: Haas F.; Hetsko C.;
Ramm H.; Smith P.;
Stevens A.; Yeaman A.

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel Haas
and counsel for certain cigarette manufacturers
providing legal advice and the thoughts and
impressions of counsel regarding scientific
research within a joint defense of pending or
anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65071
MINN NUMBERS: LG 2023824/2023826

TYPE: NO
DATE: 6/24/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; JD; WP

DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of industry counsel
at a joint industry meeting regarding proposed
areas of research for litigation and legislative
purposes and relating legal advice provided by
counsel for certain cigarette manufacturers
regarding same within a joint defense of pending
or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 65076-65078
MINN NUMBERS: LG 2023827/2023829

TYPE: NO
DATE: 7/9/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of counsel
regarding scientific research and relating legal
advice provided by counsel for certain cigarette
manufacturers regarding same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65074-65075
MINN NUMBERS: LG 2023830/2023831

TYPE: NO
DATE: 8/8/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of counsel
regarding scientific research and relating legal
advice provided by counsel for certain cigarette
manufacturers regarding same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65338-65340
MINN NUMBERS: LG 2023832/2023834

TYPE: NO
DATE: 11/14/74
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of counsel
regarding scientific research and relating legal
advice provided by counsel for certain cigarette
manufacturers regarding same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 65124-65126
MINN NUMBERS: LG 2023835/2023837

TYPE: NO
DATE: 12/11/75
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD
DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of counsel
regarding scientific research and relating legal
advice provided by counsel for certain cigarette
manufacturers regarding same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4X; 4Y
CATEGORY:
DOCUMENT LOCATION: 4X

LIG NUMBERS: 0
MINN NUMBERS: LG 2023838/2023841

TYPE: NO
DATE: 7/28/76
AUTHOR: Greer J.
RECIPIENT:

REQ NUMBER: 1 RFP 4
PRIVILEGE: AC; WP; JD

DESCRIPTION: Handwritten notes of Liggett in-house counsel
Greer to his files reflecting legal advice and
the thoughts and impressions of counsel
regarding scientific research and relating legal
advice provided by counsel for certain cigarette
manufacturers regarding same within a joint
defense of pending or anticipated litigation.

PRIV A; B; C

CATEGORY:

SUBJ 4X; 4Y

CATEGORY:

DOCUMENT LOCATION: 4X

LIG NUMBERS: 0

MINN NUMBERS: LG 2023842/2023843

TYPE: LT

DATE: 1/19/68

AUTHOR: Yeaman A.

RECIPIENT: Grant; Haas; Hetsko;
Ramm; Smith; Forsyth
cc: Little D.

REQ NUMBER: 1 RFP 4, 37

PRIVILEGE: AC; WP; JD

DESCRIPTION: Correspondence from B&W in-house counsel Yeaman
to Liggett in-house counsel Greer and counsel
for certain cigarette manufacturers providing
legal advice and relating legal advice provided
by counsel for certain cigarette manufacturers
regarding scientific research distributed within
a joint defense of pending or anticipated
litigation.

PRIV A; C

CATEGORY:

SUBJ 4Y

CATEGORY:

DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2023849/2023860

TYPE: OT
DATE: 4/30/78
AUTHOR: Shinn W.
RECIPIENT: All Counsel

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Memorandum prepared by attorney Shinn, outside
counsel for Liggett and certain cigarette
manufacturers, to counsel for certain cigarette
manufacturers providing legal advice and the
thoughts and impressions of counsel regarding
scientific research within a joint defense of
pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 4Y
CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2024046/2024059

TYPE: LT
DATE: 7/18/91
AUTHOR: Remes D.
RECIPIENT: Murray J. cc:
Chilcote; Juchatz;
Malmgren; Murray;
Parrish; Randour;
Stevens A.

REQ NUMBER: 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Remes. outside
counsel for Liggett and certain cigarette
manufacturers, to Liggett in-house counsel
Murray (copies to Tobacco Institute executives
and counsel for certain cigarette manufacturers)

providing legal advice and the thoughts and impressions of counsel regarding proposed legislation within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 7; 8; 10
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2024088/2024105

TYPE: LT
DATE: 7/5/91
AUTHOR: Remes D.
RECIPIENT: Murray J. cc: Blynn;
Chilcote; Parrish;
Riley; Stevens A.

REQ NUMBER: 1 RFP 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from attorney Remes. outside counsel for Liggett and certain cigarette manufacturers, to Liggett in-house counsel Murray (copies to Tobacco Institute executives and counsel for certain cigarette manufacturers) providing legal advice and the thoughts and impressions of counsel regarding proposed legislation within a joint defense of pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 10; 7
CATEGORY:
DOCUMENT LOCATION: 10

LIG NUMBERS: 0
MINN NUMBERS: LG 2024175/2024181

TYPE: DR
DATE: 1/25/63
AUTHOR: Council for Tobacco
Research

RECIPIENT:

REQ NUMBER: 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Draft memorandum prepared by the CTR to counsel
for certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding scientific research
distributed within a joint defense of pending or
anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 2
CATEGORY:
DOCUMENT LOCATION: 3

LIG NUMBERS: 94255-94271
MINN NUMBERS: LG 2024193/2024209

TYPE: OT
DATE:
AUTHOR: Jacob & Medinger
RECIPIENT: Legal Counsel

REQ NUMBER: 4, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from Jacob & Medinger, outside
counsel for certain cigarette manufacturers, to
counsel for certain cigarette manufacturers
providing information to assist counsel in the
rendition of legal advice regarding scientific
research distributed within a joint defense of
pending or anticipated litigation.

PRIV A; B; C
CATEGORY:

SUBJ 4Y

CATEGORY:
DOCUMENT LOCATION: 4Y

LIG NUMBERS: 0
MINN NUMBERS: LG 2024217/2024218

TYPE: OT
DATE: 4/26/78
AUTHOR: Council for Tobacco
Research

RECIPIENT:

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by CTR providing information
to assist counsel in the rendition of legal
advice regarding the compilation of publically
available the compilation of publically
available scientific research within a joint
defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024224/2024232

TYPE: LT
DATE: 5/2/80
AUTHOR: Giller F.
RECIPIENT: Brown, Bezanson,
Decker, Finnegan,
Hoel, Jacob, Northrip,
Shinn

REQ NUMBER: 4, 10, 37
PRIVILEGE: AC; WP; JD
DESCRIPTION: Correspondence from CTR executive Giller to attorney Decker, outside counsel for Liggett, and counsel for certain cigarette manufacturers providing information to assist counsel in the rendition of legal advice regarding scientific research distributed within a joint defense of pending or anticipated litigation.

PRIV A; C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024239/2024248

TYPE: LT
DATE: 4/24/80
AUTHOR: Giller F.
RECIPIENT: Colby F. cc: Decker
F; Jacob F;
Komendantou A.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from CTR executive Giller to consultant Dr. Frank Colby (copies to attorney Jacob, outside counsel for certain cigarette manufacturers) requesting information to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024252/2024257

TYPE: LT
DATE: 5/18/78
AUTHOR: Giller F.
RECIPIENT: Jacob E. CC: Hoyt T.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024258/2024264

TYPE: LT
DATE: 3/22/78
AUTHOR: Giller F.
RECIPIENT: Brown, Decker,
Finnegan, Hoel CC:
Jacob E., Colby F.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Decker, outside counsel for Liggett and counsel for certain cigarette manufacturers, providing information to assist counsel in the

rendition of legal advice regarding the
compilation of publically available scientific
research to assist counsel in the rendition of
legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 4Z; 3
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024265/2024272

TYPE: LT
DATE: 4/6/81
AUTHOR: Giller F.
RECIPIENT: Counsel

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller
to counsel for certain cigarette manufacturers,
providing information to assist counsel in the
rendition of legal advice regarding the
compilation of publically available scientific
research to assist counsel in the rendition of
legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024277/2024278

TYPE: LT
DATE: 4/24/80
AUTHOR: Giller F.
RECIPIENT: Colby F. CC: Decker
F., Jacob E.,
Komendantov A.,
DeGregori G., Kreseski
S., McShane O.,
Piscitelli R.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from CTR executive Giller to
consultant Dr. Frank Colby requesting
information to assist counsel in the rendition
of legal advice regarding the compilation of
publically available scientific research within
a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024279/2024279

TYPE: NO
DATE: 3/23/78
AUTHOR: Giller F.
RECIPIENT:

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Handwritten notes of CTR executive Giller
relating legal advice provided by attorney
Jacob, outside counsel for certain cigarette
manufacturers, regarding the compilation of
publically available scientific research within
a joint defense of pending or anticipated

litigation.
PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024280/2024288

TYPE: CH
DATE: 1/4/82
AUTHOR: Council for Tobacco
Research Literature
Retrieval Division

RECIPIENT:

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by the CTR to counsel for
certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024289/2024319

TYPE: CH
DATE: 1/1/81

AUTHOR: Council for Tobacco
Research Literature
Retrieval Division

RECIPIENT:

REQ NUMBER: 4, 10, 37

PRIVILEGE: WP; JD

DESCRIPTION: Memorandum prepared by the CTR to counsel for certain cigarette manufacturers providing information to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C

CATEGORY:

SUBJ 3; 4Z

CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0

MINN NUMBERS: LG 2024321/2024321

TYPE: LT

DATE: 4/10/78

AUTHOR: Giller F.

RECIPIENT: Brown, Decker,
Finnegan, Hoel, Jacob,
Colby

REQ NUMBER: 4, 10, 37

PRIVILEGE: WP; JD

DESCRIPTION: Correspondence prepared by CTR executive Giller to counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C

CATEGORY:

SUBJ 3; 4Z

CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024322/2024322

TYPE: LT
DATE: 12/1/77
AUTHOR: Giller F.
RECIPIENT: Jacob E. CC: Colby F.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024323/2024324

TYPE: LT
DATE: 1/30/78
AUTHOR: Giller F.
RECIPIENT: Jacob E.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD

DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024382/2024383

TYPE: LT
DATE: 11/22/77
AUTHOR: Giller F.
RECIPIENT: Jacob E. CC: Colby F.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024386/2024388

TYPE: DR
DATE: 12/1/79
AUTHOR: Giller F.
RECIPIENT: Jacob E.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024389/2024390

TYPE: OT
DATE: 4/26/78
AUTHOR: Council for Tobacco
Research Literature
Retrieval Division

RECIPIENT:

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by the CTR to counsel for certain cigarette manufacturers providing information to assist counsel in the rendition of legal advice regarding the compilation of

publically available scientific research within
a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024391/2024392

TYPE: LT
DATE: 8/7/80
AUTHOR: Giller F.
RECIPIENT: Brown, Bezanson,
Decker, Finnegan,
Hoel, Jacob, Northrip,
Shinn

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller
to counsel for certain cigarette manufacturers,
providing information to assist counsel in the
rendition of legal advice regarding the
compilation of publically available scientific
research to assist counsel in the rendition of
legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024393/2024403

TYPE: LT
DATE: 7/25/75
AUTHOR: Ramm H.
RECIPIENT: Ahrensfeld T., Bryant
D., Hetsko C., Hill
J., Roemer H. CC: FBG,
WTH, HHR, AY

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence from CTR executive Ramm to
counsel for certain cigarette manufacturers
providing information to assist counsel in the
rendition of legal advice regarding the
compilation of publically available scientific
research to assist counsel in the rendition of
legal advice within a joint defense of pending
or anticipated litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024404/2024405

TYPE: LT
DATE: 11/29/72
AUTHOR: Giller F.
RECIPIENT: Ramm H.

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Correspondence prepared by CTR executive Giller
to CTR executive Ramm, providing information to
assist counsel in the rendition of legal advice
regarding the compilation of publically
available scientific research to assist counsel
in the rendition of legal advice regarding
scientific research within a joint defense of

pending or anticipated litigation.
PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024406/2024407

TYPE: OT
DATE: 4/26/78
AUTHOR: Council for Tobacco
Research Literature
Retrieval Division

RECIPIENT:

REQ NUMBER: 4, 10, 37
PRIVILEGE: WP; JD
DESCRIPTION: Memorandum prepared by the CTR to counsel for
certain cigarette manufacturers providing
information to assist counsel in the rendition
of legal advice regarding scientific research
within a joint defense of pending or anticipated
litigation.

PRIV C
CATEGORY:

SUBJ 3; 4Z
CATEGORY:
DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024408/2024409

TYPE: OT
DATE: 4/26/78

AUTHOR: Council for Tobacco
Research Literature
Retrieval Division

RECIPIENT:

REQ NUMBER: 4, 10, 37

PRIVILEGE: WP; JD

DESCRIPTION: Memorandum prepared by the CTR to counsel for certain cigarette manufacturers providing information to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C

CATEGORY:

SUBJ 3; 4Z

CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0

MINN NUMBERS: LG 2024410/2024412

TYPE: DR

DATE: 12/1/79

AUTHOR: Giller F.

RECIPIENT: Jacob E.

REQ NUMBER: 4, 10, 37

PRIVILEGE: WP; JD

DESCRIPTION: Correspondence prepared by CTR executive Giller to attorney Jacob, outside counsel for certain cigarette manufacturers, providing information to assist counsel in the rendition of legal advice regarding the compilation of publically available scientific research to assist counsel in the rendition of legal advice regarding scientific research within a joint defense of pending or anticipated litigation.

PRIV C

CATEGORY:

SUBJ 3; 4Z

CATEGORY:

DOCUMENT LOCATION: 4Z

LIG NUMBERS: 0
MINN NUMBERS: LG 2024413/2024413

TYPE: LT
DATE: 2/24/69
AUTHOR: Welch F.
RECIPIENT: Company Legal Counsel

REQ NUMBER: 4, 37
PRIVILEGE: JD
DESCRIPTION: Correspondence from TI executive Welch to
counsel for certain cigarette manufacturers
providing information to assist counsel in the
rendition of legal advice regarding proposed
legislation within a joint defense of pending or
anticipated litigation.

PRIV A
CATEGORY:

SUBJ 3; 10
CATEGORY:
DOCUMENT LOCATION: 10