

**DWR Privilege Log re production to GMD2
KDA Case No. 18 WATER 14014**

Number corresponding to redacted document	Date of Document/Communication	Sender	Recipient(s)	Description	Claim(s) of Privilege
1.	6-27-18	Aaron Oleen, KDA DWR Attorney	David Barfield, Chief Engineer	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
2.	8-31-17	Ginger Pugh, KDA DWR	Doug Schemm, Chris Beightel, Lane Letourneau, Jeff Lanterman—KDA DWR; David Barfield—Chief Engineer	Draft Letter	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
3.	9-18-17	Ginger Pugh, KDA DWR	Doug Schemm, Chris Beightel, Lane Letourneau, Jeff Lanterman, Karen Hunter—KDA DWR; David Barfield—Chief Engineer	Draft Letter and Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
4.	3-21-18	Ginger Pugh, KDA DWR	Doug Schemm, Lane Letourneau, Chris Beightel, Jeff Lanterman—KDA DWR; David Barfield—Chief Engineer; Kenneth Titus—KDA Chief Legal Counsel	Draft Letter	K.S.A. 60-426: K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
5.	5-31-18	Ginger Pugh, KDA DWR	Kenneth Titus—KDA Chief Legal Counsel	Draft Order and Findings	K.S.A. 60-426: K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
6.	6-1-18	Ginger Pugh, KDA DWR	Kenneth Titus—KDA Chief Legal Counsel; Chris Beightel—KDA DWR; David Barfield—Chief Engineer	Draft Response/Letter	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
7.	6-1-18	Ginger Pugh, KDA DWR	David Barfield—Chief Engineer	Draft Order and Findings	K.S.A. 226(b)(4): Document prepared in anticipation of litigation

8.	6-27-18	Aaron Oleen, KDA DWR Attorney	David Barfield—Chief Engineer	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
9.	5-30-18	David Barfield, Chief Engineer	Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
10.	4-17-18	David Barfield, Chief Engineer	Doug Schemm, Ginger Pugh—KDA DWR	Draft Letter and Draft Order and Findings	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
11.	6-27-18	Aaron Oleen, KDA DWR Attorney	David Barfield—Chief Engineer	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
12.	Unknown	Lane Letourneau, KDA DWR	N/A	Draft Answers to FAQs	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
13.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
14.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
15.	3-8-16	Jim Bagley—KDA DWR	Aaron Oleen—KDA DWR Attorney	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

16.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
17.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
18.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
19.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
20.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
21.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
22.	3-4-16	Aaron Oleen, KDA DWR Attorney	Jim Bagley—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
23.	3-4-16 through 4-1-16	Aaron Oleen/Jim Bagley	Aaron Oleen/Jim Bagley	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

24.	4-1-16 through 4-4-16	Aaron Oleen/Jim Bagley	Aaron Oleen/Jim Bagley/David Barfield	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
25.	4-1-16 through 4-4-16	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
26.	4-1-18 through 5-4-16	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
27.	4-1-18 through 5-9-18	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
28.	5-10-18 through 5-11-18	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
29.	5-10-18 through 5-18-18	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
30.	5-10-18 through 5-18-18	Jim Bagley/David Barfield/Aaron Oleen	Jim Bagley/David Barfield/Aaron Oleen	Email Communications	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

31.	10-18-17	Jeff Lanterman, KDA DWR	Lane Letourneau, Chris Beightel, Kristen Baum, Cameron Conant, Matt Meier—KDA DWR; David Barfield—Chief Engineer; Susan Metzger—KDA Deputy Secretary; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
32.	8-9-18	Aaron Oleen/Brian McLeod—Deputy City Attorney, City of Wichita	Aaron Oleen/Brian McLeod	Email Communications	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
33.	8-9-18	Jeff Lanterman, KDA DWR	Kelly Stewart, Mike Meyer, Lane Letourneau—KDA DWR	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
34.	6-27-18	Aaron Oleen—KDA DWR Attorney	David Barfield—Chief Engineer; Doug Schemm—KDA DWR; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
35.	3-14-18	Jeff Lanterman—KDA DWR	Doug Schemm, Lane Letourneau—KDA DWR	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
36.	4-18-18	David Barfield, Chief Engineer	Lane Letourneau, Chris Beightel, Jeff Lanterman, Ginger Pugh, Doug Schemm—KDA DWR; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
37.	7-16-18	Kenneth Titus, KDA Chief Legal Counsel	David Barfield—Chief Engineer; Aaron Oleen—KDA DWR Attorney; Chris Beightel, Doug Schemm, Jeff Lanterman, Ginger Pugh, David Engelhaupt, Cameron Conant—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

38.	7-18-18	Aaron Oleen, KDA DWR Attorney	Lane Letourneau, Jeff Lanterman, Cameron Conant, Doug Schemm, Ginger Pugh, David Engelhaupt—KDA DWR	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
39.	6-27-18	Aaron Oleen, KDA DWR Attorney	Doug Schemm—KDA DWR; David Barfield—Chief Engineer; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
40.	12-20-17	Jeff Lanterman, KDA DWR	David Barfield—Chief Engineer; Ginger Pugh, Chris Beightel, Lane Letourneau, David Engelhaupt—KDA DWR	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
41.	3-14-18	David Barfield/Jeff Lanterman	N/A	Draft Letter	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
42.	12-20-17	David Barfield— Chief Engineer	Jeff Lanterman, Ginger Pugh, Chris Beightel, Lane Letourneau, David Engelhaupt—KDA DWR; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
43.	12-19-17	David Barfield— Chief Engineer	Chris Beightel, Lane Letourneau, David Engelhaupt, Ginger Pugh, Jeff Lanterman— KDA DWR	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
44.	12-18-17	David Barfield— Chief Engineer	Jeff Lanterman, Lane Letourneau, Chris Beightel— KDA DWR; Susan Metzger— KDA Deputy Secretary; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

45.	5-24-16	David Barfield—Chief Engineer	Dough Schemm, Jim Bagley, Lane Letourneau, Chris Beightel, Jeff Lanterman, Karen Hunter—KDA DWR; Susan Metzger, KDA Deputy Secretary	Email Communication	Email contains link to irrelevant information
46.	5-10-16	David Barfield/Aaron Oleen	David Barfield/Aaron Oleen	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
47.	10-1-15	Robert Large—Former KDA Chief Legal Counsel	Susan Metzger—KDA Deputy Secretary; David Barfield—Chief Engineer; Lane Letourneau, Jeff Jones, Doug Schemm—KDA DWR; Wendee Grady—Former KDA staff attorney	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
48.	10-1-15	David Barfield—Chief Engineer	Lane Letourneau, Chris Beightel, Jeff Lanterman, Jim Bagley, Doug Schemm—KDA DWR; Susan Metzger—KDA Deputy Secretary	Email Communication	Link to irrelevant information
49.	11-19-13	David Barfield—Chief Engineer	Sam Perkins, Jeff Lanterman, Jim Bagley, Chris Beightel, Tara Lanzrath, Lane Letourneau, Greg Foley—KDA DWR	Email Communication	Link to irrelevant information
50.	1-8-13	David Barfield—Chief Engineer	Lane Letourneau, Doug Schemm, Jim Bagley, Tara Lanzrath, Jeff Lanterman—KDA DWR	Email Communication	Link to irrelevant information
51.	6-27-18	Aaron Oleen—KDA DWR Attorney	David Barfield—Chief Engineer; Doug Schemm—KDA DWR; Kenneth Titus—KDA Chief Legal Counsel	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

52.	9-10-18	Kenneth Titus—KDA Chief Legal Counsel	Chris Beightel—KDA DWR; David Barfield—Chief Engineer	Email Communication	K.S.A. 60-426: Attorney-client privilege (not redacted yet)
53.	9-10-18	Chris Beightel/Kenneth Titus	Chris Beightel/Kenneth Titus/David Barfield	Email Communication	K.S.A. 60-426: Attorney-client privilege
54.	7-17-18	Chris Beightel/Kenneth Titus/David Barfield/Lane Letourneau	Chris Beightel/Kenneth Titus/David Barfield/Lane Letourneau	Email Communication	K.S.A. 60-426: Attorney-client privilege
55.	7-12-18	Chris Beightel/Lane Letourneau/David Barfield/Kenneth Titus	Chris Beightel/Lane Letourneau/David Barfield/Kenneth Titus	Email Communication	K.S.A. 60-426: Attorney-client privilege
56.	7-9-18	Chris Beightel/Lane Letourneau/David Barfield	Chris Beightel/David Barfield/Lane Letourneau/Jeff Lanterman/Kenneth Titus/Aaron Oleen	Email Communication	K.S.A. 60-426: Attorney-client privilege
57.	4-17-18	David Barfield/Kenneth Titus	Lane Letourneau, Chris Beightel, David Barfield, Jeff Lanterman, Doug Schemm, Ginger Pugh	Email Communication	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
58.	3-22-18	Chris Beightel—KDA DWR	David Barfield—Chief Engineer	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
59.	3-8-16	Chris Beightel—KDA DWR	David Barfield—Chief Engineer	Email Communication	K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
60.	11-5-04	Lee Rolfs	Will Gilliland/Jim Bagley	Internal memo	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation

61.	10-11-04 through 10-12-04	Lee Rolfs/Jim Bagley/Tom Huntzinger/Dan Riley/Barbara Hodgson/Will Gilliland	David Pope/Tom Huntzinger/Jim Bagley/Barbara Hodgson/Dan Riley/Will Gilliland/Bruce Falk/Leslie Garner/Debra Mendez/Jessica Lynn/Kenneth Kopp	Email Communications	K.S.A. 60-426: Attorney-client privilege
62.	10-8-04	Jim Bagley	Lee Rolfs/David Pope	Email Communication & draft memo	K.S.A. 60-426: Attorney-client privilege; K.S.A. 60-226(b)(4): Document prepared in anticipation of litigation
63.	10-11-04	Lee Rolfs/Dan Riley/Tom Huntzinger/	Dan Riley/Tom Huntzinger/David Pope/Jim Bagley/Barbara Hodgson/Will Gilliland/Bruce Falk/Leslie Garner/Debra Mendez/Jessica Lynn	Email Communication	K.S.A. 60-426: Attorney-client privilege
64.	6-23-05	Jim Bagley/Will Gilliland	Lee Rolfs/Kenneth Kopp/Will Gilliland/Jim Bagley/Doug Schemm	Email Communication	K.S.A. 60-426: Attorney-client privilege