

Jill E. Clark

From: Jill E. Clark
Sent: Friday, June 12, 2009 8:28 AM
To: Lathrop, Sara J; msullivan@lskslaw.com; jborger@faegre.com; Chad Bowman; jbead@lskslaw.com
Subject: RE: Stepnes v Ritschel (b)

Please note that Paul Stepnes asserts that evidence at this time suggests that police improperly handled emails between Paul Stepnes and his attorney(s) (Jill Clark, and perhaps others) that were resident on seized laptop(s), that the City/MPD made no provision for attorney-client privilege.

Paul Stepnes asserts an attorney-client privilege to all emails between him and any of his attorneys (including but not limited to Jill Clark), and this privilege will be maintained until such time as the emails in question in the recent supplemental 26(a)(1) from the City-defendants are reviewed and a decision is made with regard to that privilege.

Jill Clark, Esq.

Jill Clark, P.A.

Telephone: 763/417-9102

Fax: 763/417-9112

jill@jillclarkpa.com

This email may contain confidential or privileged communications. If you are not the proper recipient of this email, please destroy it and let us know that you have done so. If you are a client and want to discuss the risks associated with emails, or if you do not wish to have us communicate via email, please let us know.

From: Lathrop, Sara J [mailto:Sara.Lathrop@ci.minneapolis.mn.us]

Sent: Friday, June 12, 2009 8:14 AM

To: Jill E. Clark; msullivan@lskslaw.com; jborger@faegre.com; Chad Bowman; jbead@lskslaw.com

Subject: Stepnes v Ritschel (a)

Counsel:

Please find my clients' supplemental Response to Plaintiffs' Request for Documents, and Rule 26a1 Disclosures in this matter.

Thank you,
Sara

Sara J. Lathrop
Assistant Minneapolis City Attorney
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Minneapolis, MN 55402
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612-673-3362 (fax)
sara.lathrop@ci.minneapolis.mn.us

Exhibit 1b-i

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Paul C. Stepnes, Pete Girard, Jan
Girard, David B. Holland, Terry
Yzaguirre, Ray Neset, Bennett Ross
Taylor, Jr., Judith Wallen Taylor,

Plaintiffs,

vs.

Peter Ritschel (individual capacity),
Jane Moore (individual capacity), City
of Minneapolis, CBS Broadcasting, Inc.,
foreign corporation, and Esme Murphy
(individual),

Defendants.

0:08-cv-05296-ADM-JJK

**DEFENDANTS RITSCHEL, MOORE,
AND CITY OF MINNEAPOLIS'
SUPPLEMENTAL RESPONSES TO
PLAINTIFFS REQUEST FOR
PRODUCTION OF DOCUMENTS**

This response is intended to supplement these Defendants earlier
responses and all responses and objections made therein are incorporated herein.

SUPPLEMENTAL RESPONSES

1. Documents reviewed, referenced, or relied upon by defendants in
alleging any defenses (including affirmative defenses) to Plaintiffs' Complaint.

SUPPLEMENTAL RESPONSE: These Answering Defendants now
have in their possession a copy of an item noted previously as Inventoried
Property listed in police report CCN 08-155425: a copy of the Computer

Exhibit 16ij

**Forensic Examination Report prepared by the Minneapolis Police Department
Crime Lab, relating to the computers of Paul Stepnes.**

Please note that this report purports to contain a folder of emails to or from Attorney Jill Clark. While these emails, upon information and belief, do not contain privileged information, counsel for these Defendants has not reviewed those folders or their contents and does not contend that these emails are evidence in this case.

This report is on CD and may be viewed at the Office of the
Minneapolis City Attorney.

Dated:

6-12-09

SUSAN L. SEGAL
Minneapolis City Attorney

By



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Assistant City Attorney
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333 South 7th Street
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612-673-2072

**Attorneys for Defendants Ritschel,
Moore, and City of Minneapolis**