

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

TIARA YACHTS, INC.,

Plaintiff,

v.

BLUE CROSS BLUE SHIELD OF MICHIGAN,

Defendant.

Civil Action No.: 1:22-cv-603

Judge: Hon. Robert J. Jonker

Magistrate Judge: Ray Kent

ORAL ARGUMENT REQUESTED

**BCBSM'S RESPONSE TO PLAINTIFF'S MOTION
TO COMPEL PRODUCTION OF DOCUMENTS WITHOUT REDACTION**

CONCISE STATEMENT OF ISSUE PRESENTED

Should BCBSM be compelled to remove the privilege and relevance redactions that it properly incorporated in the document productions it has made?

BCBSM says: No.

Plaintiff says: Yes.

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I. INTRODUCTION AND BACKGROUND

Plaintiff's motion is a fishing expedition, not a genuine discovery dispute. To date, BCBSM has produced 979 documents across several productions in response to Plaintiff's October 23, 2025 Amended First Set of Requests for Production of Documents. BCBSM has included privilege-based redactions in just 39 of those documents, while withholding only 91 documents as privileged. BCBSM has described each one of those privilege claims on a document-by-document basis in the privilege log attached as an exhibit to this brief, further supported by a sworn declaration from BCBSM in-house attorney Kevin Stanko. As detailed below, those privilege claims are valid, including with respect to the two documents Plaintiff specifically challenges. And Plaintiff cannot invoke the fiduciary exception since the withheld documents relate to *post*-decisional, adversarial matters and not a supposed BCBSM fiduciary function.

The only other BCBSM redactions shield the confidential information of BCBSM's other customers, which is well outside the scope of this matter and irrelevant to the claims and defenses at issue. While BCBSM acknowledges a general rule disfavoring relevance-based redactions, serial litigation by Plaintiff's counsel against BCBSM warrants the application of a recognized exception in this Circuit to that rule. Over more than 20 years and more than 200 cases against BCBSM, Plaintiff's counsel has repeatedly repurposed documents obtained from BCBSM in one matter to recruit new clients and file new claims against BCBSM. These redactions are intended to protect BCBSM and its customers from those aggressive litigation tactics. The redactions are therefore appropriate and necessary under the circumstances and should remain in place.

II. ANALYSIS

A. BCBSM's claims of attorney-client privilege and work-product protection are valid.

Under federal law, the attorney-client privilege applies as follows:

(1) [w]here legal advice of any kind is sought (2) from a professional legal adviser in his capacity as such, (3) the communications relating to that purpose, (4) made in confidence (5) by the client, (6) are at his instance permanently protected (7) from disclosure by himself or by the legal advisor, (8) except the protection be waived.

Fausek v. White, 965 F.2d 126, 129 (6th Cir. 1992) (quoting *United States v. Goldfarb*, 328 F.2d 280 (6th Cir.), *cert. denied*, 84 S.Ct. 1883 (1964)). The purpose of the privilege “is to encourage full and frank communications between attorneys and their clients and thereby promote broader public interests in the observance of law and administration of justice.” *Upjohn Co. v. United States*, 449 U.S. 383, 389 (1981). In the corporate context, “[c]ourts have extended the protection outlined in *Upjohn* to communications between non-attorney corporate employees where the communications were made for purposes of securing legal advice from counsel.” *Cequent Perf. Prods., Inc. v. Hopkins Mfg. Corp.*, No. 13-cv-15293, 2017 WL 2264784, at *3 (E.D. Mich. May 24, 2017) (quoting *Graff v. Haverhill North Coke Co.*, No. 1:09-cv-670, 2012 WL 5495514, at *7 (S.D. Ohio Nov. 13, 2012)). As a court in this district has observed in the attorney-client privilege context, “[i]f the confidentiality of an internal investigation is not protected . . . the corporation would be far less likely to allow the investigation to take place or would be far more likely to limit the scope of the investigation.” *Picard v. Chem. Inc. Profit Sharing Plan v. Perrigo Co.*, 951 F. Supp. 679, 685 (W.D. Mich. 1996).

Relatedly, Fed. R. Civ. P. 26(b)(3)(A) mandates that “[o]rdinarily, a party may not discover documents and tangible things that are prepared in anticipation of litigation or for trial by or for another party or its representative” This work-product doctrine “is distinct from and broader than the attorney-client privilege.” *In re Columbia/HCA Healthcare Corp. Billing Practices Litig.*, 293 F.3d 289, 294 (6th Cir. 2002) (quoting *In re Antitrust Grand Jury*, 805 F.2d 155, 163 (6th Cir. 1986)). It extends to “fact” work product, which is “the written or oral information transmitted to

the attorney and recorded as conveyed by the client.” *Id.* Fact work product must be protected except “upon a showing of substantial need and inability to otherwise obtain without material hardship.” *Id.* The doctrine also covers “opinion” work product, which is “any material reflecting the attorney’s mental impressions, conclusions, judgments, or legal theories.” *Id.* Opinion work product is discoverable only after a privilege waiver. *Id.*

When a party withholds documents and information based on either of these privileges, Fed. R. Civ. P. 26(a)(5) requires the party to create a privilege log. “[E]ach document in a privilege log should contain details including: date, author and all recipients of the document, subject matter, and an explanation as to why the document should be privileged and not produced in discovery.” *Carhartt, Inc. v. Innovative Textiles, Inc.*, 333 F.R.D. 118, 120 (E.D. Mich. 2019) (quoting *Clark Const. Grp., Inc. v. City of Memphis*, 2005 WL 6187896, at *3 (W.D. Tenn. Feb. 9, 2005)). The Sixth Circuit has held that a party asserting a privilege must make only “a minimal showing that the communication involved legal matters. This showing is not onerous and may be satisfied by as little as a statement in the privilege log explaining the nature of the legal issue for which advice was sought.” *Id.* (quoting *In re Search Warrant Executed at Law Offices of Stephen Garea*, 173 F.3d 429, 1999 WL 137499, *2 (6th Cir. 1999)); *see also Grand Traverse Band of Ottawa and Chippewa Indians v. Blue Cross Blue Shield of Mich.*, No. 14-11349, 2021 WL 3021267 (E.D. Mich. July 16, 2021) (finding BCBSM privilege log entries sufficient based on inclusion of fields described in *Carhartt*).

Both a privilege log and a declaration by BCBSM’s in-house counsel, Kevin Stanko, are attached to this brief in support of BCBSM’s privilege claims. (**Ex. A, B**). Most of the documents listed on the privilege log relate to communications between members of a “high-impact workgroup” that BCBSM formed to investigate fraudulent claims being submitted by certain out-

of-state non-participating healthcare providers. As Mr. Stanko states in his declaration, he was asked to provide legal advice on this issue after a BCBSM customer brought it to BCBSM's attention and made a settlement demand. (Ex. A, ¶ 6). To that end, Mr. Stanko directed this internal workgroup to compile information he needed to provide a legal opinion on this issue. (Ex. A, ¶ 9).

Both documents that Plaintiff has specifically challenged in its motion—which were redacted on privilege grounds—fall into this category. (ECF No. 151, PageID.2200-01). As reflected in BCBSM's privilege log, one sentence in BCBSM-Tiara_004343 was redacted because it relays legal advice among workgroup members that was provided by BCBSM's Office of General Counsel. And a sentence in BCBSM-Tiara_004203 reflects discussions between non-attorney members of the workgroup that were made to secure legal advice with respect to a discrete issue that the workgroup was examining. Thus, BCBSM's assertions of privilege with respect to the two specific challenges Plaintiff has raised in its motion are valid, as are the remaining privilege assertions contained in its privilege log.

Plaintiff incorrectly argues that the fiduciary exception to the attorney-client privilege exempts BCBSM's privileged documents from protection. Not so. “Under the fiduciary exception in the context of ERISA, ‘a fiduciary of an ERISA plan must make available to the beneficiary, upon request, any communications with an attorney that are intended to assist *in the administration of the plan.*’” *Moss v. Unum Life Ins. Co.*, 495 F. App'x 583, 595 (6th Cir. 2012) (quoting *Bland v. Fiatallis N. Am., Inc.*, 401 F.3d 779, 787 (7th Cir. 2005)) (emphasis added).

But as the Sixth Circuit has held, “[t]he fiduciary exception generally applies only to communications related to plan administration and not to communications after a final decision or ‘addressing a challenge to the plan administrator in his or her personal capacity.’” *Id.* at 595-96. Thus, “[t]he plan administrator may assert attorney-client privilege as to communications between

the administrator and its attorneys on non-fiduciary matters, such as when the communications relate to plan sponsor or ‘settlor’ functions of adopting, amending, or terminating an ERISA plan” *Pfeil v. State St. Bank and Trust Co.*, No. 09-12229, 2013 WL 12231901, at *3 (E.D. Mich. Apr. 2, 2013) (quoting *Tatum v. R.J. Reynolds Tobacco Co.*, 247 F.R.D. 488, 493 (M.D.N.C. 2008)). “The plan administrator may also assert an attorney-client privilege as to communications regarding legal advice to the fiduciary for his or her own protection against plan beneficiaries.” *Id.*

Plaintiff cannot show that the documents and communications at issue here relate to a BCBSM fiduciary function. As the Sixth Circuit noted, BCBSM’s fiduciary status under ERISA “is not an all or nothing concept.” *Tiara Yachts, Inc. v. Blue Cross Blue Shield of Mich.*, 138 F.4th 457, 463 (6th Cir. 2025). Rather, the Court must “take a functional approach” and determine “whether BCBSM ‘was acting as a fiduciary (that is, was performing a fiduciary function)’ with respect to a specific action. *Id.* Here, Plaintiff contends that the documents and communications at issue are not protected because they relate to “paying claims using plan assets.” (ECF No. 151, PageID.2204). But BCBSM continues to dispute this characterization, and it remains a dispute at this stage of discovery.

Regardless, the documents and communications from which Plaintiff seeks to strip BCBSM of its privilege protections relate to *post*-decisional, adversarial matters. As described in Mr. Stanko’s declaration, the issue of fraudulent claims by out-of-state non-participating providers was brought to BCBSM’s attention in the context of a different BCBSM customer making a settlement demand. After receiving this information and the demand, BCBSM established an internal workgroup to, among other things, assess BCBSM’s liability, determine the root causes of the problem, create potential solutions, and prepare BCBSM for issues that might arise in litigation. None of that activity related to plan administration; it related entirely to post-decisional efforts by

BCBSM to address an adversarial position taken by one of its customers. *See Pfeil*, 2013 WL 12231901, at *4 (“[w]hen an ERISA trustee seeks legal advice for his own protection, the legal fiction of ‘trustee as representative of the beneficiaries’ is dispelled”) (quoting *United States v. Mett*, 178 F.3d 1058, 1065 (9th Cir. 1999)). The fiduciary exception therefore does not apply here, and BCBSM’s assertions of attorney-client privilege, which are reflected in its privilege log, should be upheld.

B. BCBSM’s redaction of information related to its other customers is appropriate given Plaintiffs’ counsel’s propensity for fishing.

Under Fed. R. Civ. P. 26(b)(1), parties are entitled to information in discovery only to the extent that it is “relevant to any party’s claim or defense and proportional to the needs of the case.” There may be, as Plaintiff has pointed out, a “general rule” that redacting documents based on relevance is disfavored. *Quicken Loans, Inc. v. Brooks*, No. 07-13143, 2010 WL 11541988, at *5 (E.D. Mich. Mar. 12, 2010). But as a court in the Northern District of Ohio recently recognized, “the concept of relevance . . . is not unlimited.” *Lubrizol Corp. v. Int’l Business Machines Corp.*, No. 21-cv-00870, 2023 WL 5103944, at *4 (N.D. Ohio Aug. 9, 2023) (quoting *Gard v. Grand River Rubber & Plastics Co.*, No. 1:20-cv-125, 2021 WL 75655, at *4 (N.D. Ohio Jan. 8, 2021)).

According to the *Lubrizol* court, “[w]hile a plaintiff should ‘not be denied access to information necessary to establish her claim,’ a plaintiff may not be ‘permitted to go fishing and a trial court retains discretion to determine that a discovery request is too broad and oppressive.’” *Id.* (quoting *In re Ohio Execution Protocol Litig.*, 845 F.3d 231, 236 (6th Cir. 2016)). Applying these principles, the *Lubrizol* court permitted IBM to redact information related to *customers other than the plaintiff*. *Id.* at *4, 6. Part of its rationale was that there were “indication[s] that a protective order would be insufficient to address the producing party’s confidentiality concerns.” *Id.* at *4.

Other courts have made similar findings. *See, e.g., LKQ Corp. v. Kia Motors Am., Inc.*, No. 21 C 3166, 2023 WL 3455315, at *6 (N.D. Ill. May 15, 2023) (permitting irrelevance-based redactions of “information related to other automakers’ vehicles, including competitors, for parts not at issue in this litigation”); *Spano v. Boeing Co.*, No. 3:06-cv-00743, 2008 WL 1774460, at *2 (S.D. Ill. Apr. 16, 2008) (“The Court also rejects Plaintiffs’ argument that redaction is an improper method of challenging the relevance of a document.”).

There are substantial reasons to permit redaction here. For one, the cases establishing the “general rule” related to redactions were decided before the Federal Rules of Civil Procedure were amended in 2015. *See, e.g., Quicken Loans*, 2010 WL 11541988. One of the significant amendments in 2015 was to restrict the scope of discovery from information that is “relevant or reasonably calculated to the discovery of admissible evidence” to information that is “relevant to any party’s claim or defense.” With the 2015 amendments, “[i]t is now the power—and *duty*—of the district courts actively to manage discovery and to limit discovery that exceeds its proportional and proper bounds.” *Helena Agri-Enter., LLC v. Great Lakes Grain, LLC*, 988 F.3d 260, 274 (6th Cir. 2021). That includes limiting available discovery to only relevant information.

Additionally, the unique history between Plaintiff’s counsel and BCBSM weighs in favor of redacting other customers’ information. A Westlaw docket search for (Varnum AND “Blue Cross”) results in more than 200 hits, primarily in the U.S. District Court for the Eastern District of Michigan, in which Plaintiff’s counsel has been lead counsel against BCBSM over the past 20 years.

Throughout this history, Plaintiff’s counsel has regularly used documents produced in one case as a source for new clients and lawsuits. For example, several of the exhibits attached to Plaintiff’s Complaint come from a prior case. And in another instance, Plaintiff’s counsel sued the

United States Department of Labor to get access to BCBSM customer information. *Varnum LLP v. United States Dep't of Lab.*, No. 1:18-cv-1156, 2021 WL 1387773 (W.D. Mich. Mar. 15, 2021). Specifically, Plaintiff's counsel improperly attempted to obtain "disclosure of settlement information between Blue Cross Blue Shield of Michigan (BCBSM) and certain Administrative Service Only (ASO) clients." *Id.* at *1. A court in the Western District of Michigan denied its request. *Id.* at *7. BCBSM therefore rightfully exercises caution in producing documents to Plaintiff's counsel, particularly considering the inherently sensitive nature of the medical and technical information contained in the documents that BCBSM has in its possession.

Given Plaintiff's counsel's demonstrated propensity to go fishing through case documents for new clients and claims, even when confidentiality orders have been put in place, there is ample reason to believe that the confidentiality order in this case is insufficient protection against the disclosure of other BCBSM customer information. BCBSM therefore appropriately redacted its customers' information in the documents it produced to Plaintiff, including in the documents Plaintiff specifically challenges on this basis in its motion: BCBSM-Tiara_004192, BCBSM-Tiara_004195, BCBSM-Tiara_004197, BCBSM-Tiara_004209, and BCBSM-Tiara_004374. (ECF No. 151, PageID.2200-01, 2209).

Plaintiff contends that BCBSM's redactions are improper because they are not permitted by the protective order in this case, but that is simply incorrect. The protective order addresses redactions with respect to Protected Health Information (PHI), but does not address the redaction of information that is outside the scope of discovery. It is silent on this topic.

Plaintiff also argues that BCBSM's customer names are a matter of public record, making confidentiality improper. But this argument also misses the mark. While there may be public means available for identifying some of BCBSM's customers, specific information regarding such

BCBSM customers is *not* publicly available. That is the commercially sensitive (and sometimes privileged) information from which Plaintiff wants to remove both BCBSM's appropriate redactions *and* its confidentiality designations. Removing redactions and confidentiality designations so Plaintiff's counsel can share the information with third-party consultants, presumably so Plaintiff's counsel can identify prospective clients, would be improper even if there is general information about BCBSM's customers that is available to the public.

III. CONCLUSION

BCBSM properly asserted the attorney-client privilege and work-product doctrine over the documents listed in its privilege log, and it has appropriately redacted irrelevant customer information based on Plaintiff's counsel's litigation history. BCBSM therefore respectfully requests that the Court deny Plaintiff's motion.

Respectfully submitted,

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INDEX OF EXHIBITS

Exhibit A. Kevin Stanko Declaration

Exhibit B. BCBSM Privilege Log

EXHIBIT A

DECLARATION OF KEVIN STANKO

I, Kevin Stanko, declare as follows under penalty of perjury under the laws of the United States of America:

1. I have personal knowledge of the facts in this declaration. If called as a witness, I will competently testify that the declaration is true and correct.

2. I am an employee of Blue Cross Blue Shield of Michigan ("BCBSM"), and my current title is Senior Attorney, Office of the General Counsel.

3. In or around 2017, BCBSM became aware of instances in which unscrupulous providers were taking advantage of BCBSM's benefit claims processing logic to charge exorbitant amounts for certain types of claims.

4. Specifically, I understand that, pursuant to a group's benefit design, BCBSM claims processing logic permits certain types of claims to be reimbursed at the amount charged by an out-of-state, non-participating provider under certain circumstances.

5. I further understand that some out-of-state, non-participating providers abused this benefit design and claims processing logic by intentionally submitting grossly inflated charges for these referral claims.

6. In 2017, a BCBSM customer brought these abusive provider billing practices to BCBSM's attention. After discussion with BCBSM, the customer asserted that BCBSM had overpaid on the fraudulent, abusive claims made by out-of-state non-participating providers, and it demanded reimbursement as a settlement of the matter.

7. Consequently, I was asked, in my capacity as Senior Attorney in the Office of the General Counsel, to provide legal advice on: (1) BCBSM's legal obligations to detect and/or prevent such abusive provider billing practices; (2) BCBSM's response to the customer's

settlement demand; (3) BCBSM's potential exposure to litigation regarding the abusive provider billing practices; and (4) steps that BCBSM should take to minimize any potential exposure to such litigation.

8. To that end, I directed an internal workgroup of BCBSM employees to compile information necessary for me to provide a legal opinion on these issues.

9. Specifically, I requested the workgroup to compile information concerning: (1) the operation of the claims processing logic at issue; (2) the list of customers potentially affected; (3) potential steps that BCBSM could take to minimize or detect the abusive provider billing practices; and (4) any language in the customers' contracts or benefit design documents that might be relevant to the issue.

10. I have reviewed BCBSM's privilege log and certain documents listed in it. Based on my review, I can confirm that the following descriptions of protected documents are accurate: (1) emails and email threads between BCBSM employees sharing work product and other privileged materials that were created at my direction; (2) direct communications between me and BCBSM employees that share or discuss privileged materials; and (3) materials prepared at my direction to enable me to provide legal advice regarding abusive provider practices in anticipation of potential litigation by BCBSM customers.



KEVIN STANKO

DATED: July 2, 2026

EXHIBIT B

Privilege Log ID	Custodian	Date	Email From	Email To	Email CC	PrivilegeType	Privilege Description
BCBSM-Tiara_Priv_000001	Bouman, Joan	11/13/2020	N/A	N/A	N/A	Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000002	Bouman, Joan	11/13/2020	N/A	N/A	N/A	Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000003	Bouman, Joan	8/8/2019	VanTorre-Werme, Michelle M.	Bouman, Joan; Moore, Tani	N/A	Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000004	Bouman, Joan	8/8/2019	N/A	N/A	N/A	Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000005	Bouman, Joan	9/5/2019	VanTorre-Werme, Michelle M.	Moore, Tani; Bouman, Joan	N/A	Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials create by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000006	Bouman, Joan	9/5/2019	N/A	N/A	N/A	Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000007	Bouman, Joan	10/7/2019	VanTorre-Werme, Michelle M.	Bouman, Joan; Moore, Tani	N/A	Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000008	Bouman, Joan	10/7/2019	N/A	N/A	N/A	Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000009	Bouman, Joan	11/11/2019	Bouman, Joan	Churchill, Phillip	Alden, Kathy	Attorney-Client Privilege	Email from BCBSM employee Joan Bouman to BCBSM in-house counsel Phillip Churchill seeking information regarding privileged email and materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000010	Bouman, Joan	11/11/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000011	Bouman, Joan	11/11/2019	Bouman, Joan	Churchill, Phillip	Alden, Kathy	Attorney-Client Privilege	Email from BCBSM employee Joan Bouman to BCBSM in-house counsel Phillip Churchill seeking information regarding privileged email and materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000012	Bouman, Joan	11/11/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000013	Bouman, Joan	7/13/2015	Bouman, Joan	Stanko, Kevin; Caldwell, Margaret, J.	Umarji, Medha S.	Attorney-Client Privilege	Email thread requesting legal advice from in-house counsel Kevin Stanko regarding use of Non-Disclosure Agreements
BCBSM-Tiara_Priv_000014	Delaney, Nadiya	8/30/2017	Delaney, Nadiya	Jones-Schneider, Kimberly; Gawronski, Carol; Malmgren, Dianne; Brister, Luzine; Montagano Roegner, Michele M.; Nagy, Karol; Hopper, Robert; Ozdarski, Paul	Wood, Judith; Stanko, Kevin; Ozdarski, Paul	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees and in-house counsel Kevin Stanko sharing information compiled at the request and direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000015	Delaney, Nadiya	5/23/2019	Kodamanchali, Madhu Sudhan	Long, Richard W.; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, David; Byrd, Bruce; Akram, Raquel; Fritsch, Patricia; de Klerk, Steven; Stewart, Phyllis; Patton, Roxanne M.; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Masserant, Annette; Mehta, Sanjana; Jones, Raquel; Katti, Raghavendra; Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph		Attorney-Client Privilege; Work Product	Email thread between BCBSM employees and in-house counsel Kevin Stanko sharing information for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation

BCBSM-Tiara_Priv_000016	Delaney, Nadiya	5/28/2019	Kodamanchali, Madhu Sudhan	Doepker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, Davida; Byrd, Bruce; Akram, Raquel; Fritsch, Patricia; de Klerk, Steven; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Mehta, Sanjana; Jones, Raquel; Patton, Roxanne M.; Masserant, Annette	Briser, Luzine; Katti, Raghavendra	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees and in-house counsel Kevin Stanko sharing information compiled at the request and direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000017	Delaney, Nadiya	5/28/2019	N/A			Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice re abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000018	Delaney, Nadiya	5/28/2019	N/A			Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice re abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000019	Briggs, Whitney	12/3/2018	Ham, Sandy	Evans, Jeneene; Marvin, Dawn; Emple, Jennifer C.; Erhart, Brandon; Briggs, Whitney W.; Kiszka, Mark		Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials from BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000020	Briggs, Whitney	12/3/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000021	Briggs, Whitney	12/3/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000022	Briggs, Whitney	10/7/2019	Ham, Sandy	Evans, Jeneene; Emple, Jennifer C.; Erhart, Brandon; Briggs, Whitney W.; Kiszka, Mark; Ritsema, Lauren K.		Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000023	Briggs, Whitney	10/7/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000024	Briggs, Whitney	11/5/2019	Ham, Sandy	Evans, Jeneene; Emple, Jennifer C.; Erhart, Brandon; Briggs, Whitney W.; Kiszka, Mark; Ritsema, Lauren K.		Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000025	Briggs, Whitney	11/5/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000026	Briggs, Whitney	8/8/2019	Ham, Sandy	Evans, Jeneene; Emple, Jennifer C.; Erhart, Brandon; Briggs, Whitney W.; Kiszka, Mark		Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000027	Briggs, Whitney	8/8/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000028	Briggs, Whitney	9/5/2019	Ham, Sandy	Evans, Jeneene; Emple, Jennifer C.; Erhart, Brandon; Briggs, Whitney W.; Kiszka, Mark		Attorney-Client Privilege	Email thread between BCBSM employees sharing privileged email and materials created by BCBSM in-house counsel Phillip Churchill tracking legal information related to open subrogation matters
BCBSM-Tiara_Priv_000029	Briggs, Whitney	9/5/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters

BCBSM-Tiara_Priv_000030	Jones-Schneider, Kimberly	4/24/2020	Fullerton, Michelle	Sabatella, Annette; White, Toni, Katti, Raghavendra; Nosakowski, Jennifer; Bueche, Teresa; Sibers, Carl; Vogel, Michelle; Brister, Luzine; Rabideau, Renee; Jones-Schneider, Kimberly; Paszek, Lukaz M.; Stanko, Kevin; Thomas, Jason; Lewis, Orin M.; Edwards, Carmi; Smith, Craig; Cleaver, Maya; Heath, Sharon	Memon, Bilal; Taylor, Lisa M.; Haralson, Tonya; Wiley, Melanie Orr; Makki, Zainab	Attorney-Client Privilege	Email invitation for high-impact workgroup meeting including BCBSM in-house attorney Kevin Stanko and describing overview of issues to examine in connection with securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000031	Jones-Schneider, Kimberly	5/4/2020	Fullerton, Michelle	Sabatella, Annette; White, Toni, Katti, Raghavendra; Nosakowski, Jennifer; Bueche, Teresa; Sibers, Carl; Vogel, Michelle; Brister, Luzine; Rabideau, Renee; Jones-Schneider, Kimberly; Paszek, Lukaz M.; Stanko, Kevin; Thomas, Jason; Lewis, Orin M.; Edwards, Carmi; Smith, Craig; Cleaver, Maya; Heath, Sharon	Memon, Bilal; Taylor, Lisa M.; Haralson, Tonya; Wiley, Melanie Orr; Makki, Zainab	Attorney-Client Privilege	Email invitation for high-impact workgroup meeting including BCBSM in-house attorney Kevin Stanko and describing overview of issues to examine in connection with securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000032	Kuhar, Jennifer	8/9/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000033	Jones-Schneider, Kimberly	10/24/2018	Ozdarski, Paul	Kapoor, Atul; Simmer, Thomas M.D.; Johnson, Jerry M.D.; Savage, Juanita E.; Engler, Ann M.; Cleaver, Maya; Liu, Kathy; Crowell, Daniel L.; Varnier, Lisa; Henderson, Bruce; Lusk, Richard W.; Gawronski, Carol; Greene, Ethel Denise; Gase, Deborah A.; Jones-Schneider, Kimberly	Malmgren, Dianne	Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house attorney Bruce Henderson sharing information compiled at the request and direction of BCBSM in-house counsel Kevin Stanko for purposes of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000034	Jones-Schneider, Kimberly	10/24/2018	Ozdarski, Paul	Kapoor, Atul; Simmer, Thomas M.D.; Johnson, Jerry M.D.; Savage, Juanita E.; Engler, Ann M.; Cleaver, Maya; Liu, Kathy; Crowell, Daniel L.; Varnier, Lisa; Henderson, Bruce; Lusk, Richard W.; Gawronski, Carol; Greene, Ethel Denise; Gase, Deborah A.; Jones-Schneider, Kimberly	Malmgren, Dianne	Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house attorney Bruce Henderson sharing information compiled at the request and direction of BCBSM in-house counsel Kevin Stanko for purposes of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000035	Jones-Schneider, Kimberly	(a): 5/29/2019 ; (b): 5/28/2019	(a): Ozdarski, Paul ; (b): Kodamanchali, Madhu Sudhan	(a): Hader, Emily; Brister, Carl; Jones-Schneider, Kimberly ; (b): Doepker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, Davida; Byrd, Bruce; Akram, Raquet; Fritsch, Patricia; de Klerk, Steve; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Mehta, Sanjana; Jones, Raquet; Patton, Roxanne M.; Masserant, Annette	(a): Hambright, Johanna ; (b): Brister, Luzine; Katti, Raghavendra	Attorney-Client Privilege; Work Product	Email between BCBSM employees sharing work product prepared at the direction of BCBSM in-house attorney Kevin Stanko for the purposes of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000036	Jones-Schneider, Kimberly	5/29/2019	N/A			Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice re abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000037	Jones-Schneider, Kimberly	5/29/2019	N/A			Attorney-Client Privilege; Work Product	Materials compiled at the request and direction of BCBSM in-house attorney Kevin Stanko for the purposes of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims- in anticipation of potential litigation
BCBSM-Tiara_Priv_000038	Jones-Schneider, Kimberly	4/8/2019	Conigliaro, Joseph	Jones-Schneider, Kimberly; McCord, Jessica; Owens, Paul M.; Selden, Leslie; Westphal, David		Attorney-Client Privilege	Email between BCBSM employees sharing legal advice from BCBSM in-house counsel Kevin Stanko and information prepared for the purpose of securing legal advice from Stanko regarding GORacle billing issue
BCBSM-Tiara_Priv_000039	Jones-Schneider, Kimberly	4/8/2019	N/A			Attorney-Client Privilege	Materials shared between BCBSM employees prepared for the purpose of securing legal advice from BCBSM in-house counsel Kevin Stanko regarding GORacle billing issue

BCBSM-Tiara_Priv_000040	Jones-Schneider, Kimberly	4/8/2019	N/A			Attorney-Client Privilege	Materials prepared by BCBSM employees with the assistance of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding GORacle billing issue
BCBSM-Tiara_Priv_000041	Jones-Schneider, Kimberly	4/8/2019	N/A			Attorney-Client Privilege	Materials shared between BCBSM employees prepared for the purpose of securing legal advice from BCBSM in-house counsel Kevin Stanko regarding GORacle billing issue
BCBSM-Tiara_Priv_000042	Jones-Schneider, Kimberly	2/11/2019	Liu, Kathy	Cleaver, Maya; Lusk, Richard W.; Malmgren, Dianne; Burnett, Nina A.; Ozdarski, Paul; McPhail Stripling, Cathleen; Savage, Juanita E.; DiFranco, Duane J., MD.; Vamier, Lisa; Rabideau, Renee; Henderson, Bruce; Sabatella, Annette; Jones-Schneider, Kimberly; Crowell, Daniel L.; DiLella, Peter; Albert, Peter G.; Kapoor, Atul; Gregory, Amanda E.; Gase, Deborah A.; Greene, Ethel Denise; Klopfer, Marsha; Siebers, Carl; Shankin, Arthur A.; Gaulzetti, Janita; Edwards, Carmi; Rubleski, Jeff; Vogel, Michelle; Paul, Sarda; Thomas, Jason; Hicks, Kamia; Chen, Briana; MacClennan, Debra; Wood, Judith	Email between BCBSM employees including BCBSM in-house attorney Bruce Henderson sharing information compiled at the request and direction of BCBSM in-house counsel Kevin Stanko for purposes of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims	Attorney-Client Privilege	Email between BCBSM employees including BCBSM in-house counsel Bruce Henderson sharing materials prepared at the direction of Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000043	Jones-Schneider, Kimberly	2/11/2019	Ozdarski, Paul	Liu, Kathy		Attorney-Client Privilege; Work Product	Email between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Bruce Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000044	Jones-Schneider, Kimberly	2/11/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Bruce Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of litigation
BCBSM-Tiara_Priv_000045	Jones-Schneider, Kimberly	2/11/2019	Ozdarski, Paul	Liu, Kathy		Attorney-Client Privilege; Work Product	Email between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Bruce Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000046	Jones-Schneider, Kimberly	2/11/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Bruce Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000047	Jones-Schneider, Kimberly	2/11/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Bruce Henderson for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000048	Jones-Schneider, Kimberly	11/5/2018	Churchill, Phillip	Begosa, Rod; Burgin, Jim; Gemmel, Derek D.; Goins, Timothy; Gray, Shakela; Jamerson, Regina; Lockhart, Leslie; Malik, David R.; Noonan, Timothy; Peters, John; Quinn, Sophia; VanTorre-Werme, Michelle M.; Bruce, Mark; Salatrik, Christina P.; Loepp, Jason J.; Mays, Greg; D'Amico, Daniel; Kroll, Kevin; Humme, Nathan B.; Luke, Robert J.; White, Toni; Winters-Smith, Nicole J.; Meissner, Michael; Root, Kelley J.; Frisbey-Federighe, Tina; Karim, Derrick; Kelly, Stephanie; Grant, Kyle; Staub, Christopher F.	Alden, Kathy; Cabello, Leela; Jones-Schneider, Kimberly; Nosakowski, Joe	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000049	Jones-Schneider, Kimberly	11/5/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000050	Jones-Schneider, Kimberly	11/5/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters

BCBSM-Tiara_Priv_000051	Jones-Schneider, Kimberly	12/3/2018	Churchill, Phillip	Begosa, Rod; Burgin, Jim; Gemmel, Derek D.; Goins, Timothy; Gray, Shakela; Jamerson, Regina; Lockhart, Leslie; Malik, David R.; Noonan, Timothy; Peters, John; Quinn, Sophia; VanTorre-Werme, Michelle M.; Bruce, Mark; Salatrik, Christina P.; Loepp, Jason J.; Mays, Greg; D'Amico, Daniel; Kroll, Kevin; Humme, Nathan B.; Luke, Robert J.; White, Toni; Winters-Smith, Nicole J.; Meissner, Michael; Root, Kelley J.; Frisbey-Federighe, Tina; Karim, Derrick; Kelly, Stephanie; Grant, Kyle; Staub, Christopher F.	Alden, Kathy; Cabello, Leela; Jones-Schneider, Kimberly; Nosakowski, Joe	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000052	Jones-Schneider, Kimberly	12/3/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000053	Jones-Schneider, Kimberly	12/3/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000054	Jones-Schneider, Kimberly	11/5/2018	Churchill, Phillip	Begosa, Rod; Burgin, Jim; Gemmel, Derek D.; Goins, Timothy; Gray, Shakela; Jamerson, Regina; Lockhart, Leslie; Malik, David R.; Noonan, Timothy; Peters, John; Quinn, Sophia; VanTorre-Werme, Michelle M.; Bruce, Mark; Tyree, Christina P.; Loepp, Jason J.; Mays, Greg; D'Amico, Daniel; Kroll, Kevin; Humme, Nathan B.; Luke, Robert J.; White, Toni; Winters-Smith, Nicole J.; Meissner, Michael; Root, Kelley J.; Frisbey-Federighe, Tina; Karim, Derrick; Kelly, Stephanie; Grant, Kyle; Staub, Christopher F.	Alden, Kathy; Cabello, Leela; Jones-Schneider, Kimberly; Nosakowski, Joe	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000055	Jones-Schneider, Kimberly	11/5/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000056	Jones-Schneider, Kimberly	11/5/2018	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000057	Jones-Schneider, Kimberly	8/7/2019	Churchill, Phillip	Cabello, Leela	Kuhar, Jennifer E.; Jones-Schneider, Kimberly; Provost, Kevin	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000058	Jones-Schneider, Kimberly	8/7/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000059	Jones-Schneider, Kimberly	8/12/2019	Churchill, Phillip	Vogelei, Kirk A.	Jones-Schneider, Kimberly; Cabello, Leela; Kuhar, Jennifer E.	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000060	Jones-Schneider, Kimberly	8/12/2019	Churchill, Phillip	Goins, Timothy; Gray, Steve; Jamerson, Regina; Lockhart, Leslie; Malik, David R.; Noonan, Timothy; Peters, John; Quinn, Sophia; VanTorre-Werme, Michelle M.; Bruce, Mark; Tyree, Christina P.; Loepp, Jason J.; Mays, Greg; D'Amico, Daniel; Kroll, Kevin; Humme, Nathan B.; Luke, Robert J.; White, Toni; Winters-Smith, Nicole J.; Meissner, Michael; Root, Kelley J.; Frisbey-Federighe, Tina; Karim, Derrick; Ham, Sandy; Kelly, Stephanie; Grant, Kyle; Staub, Christopher F.; Alderman, Megan L.; Woodard, Tracy; Herro, Terre L.; Roberts, Andrea; Godbey, Todd M.; Nasarzewski, Kimberly; Tidwell, Jessica; Peters, John; Landin, Jennifer; Winters-Smith, Nicole J.; Zelman, Matthew M.; Landin, Jennifer; Hughes, Veronique; Quiroga, Kelli; Cooperwood, Stacey M.; Bostic, Rowena; Woods, Lynsi A.	Cabello, Leela; Jones-Schneider, Kimberly; Nosakowski, Joe; Weipert, Marshall; Provost, Kevin	Attorney-Client Privilege	Email from BCBSM in-house counsel Phillip Churchill to BCBSM employees sharing privileged materials created by Churchill to track legal information related to open subrogation matters
BCBSM-Tiara_Priv_000061	Jones-Schneider, Kimberly	8/12/2019	N/A			Attorney-Client Privilege; Work Product	Document created by BCBSM in-house counsel Phillip Churchill to track legal information related to open subrogation matters

BCBSM-Tiara_Priv_000062	Ozdarski, Paul	(a): 9/25/2020 ; (b): 5/28/2019	(a): Ozdarski, Paul ; (b): Kodamanchali, Madhu Sudhan	(a): Haralson, Tonya; Wasikowski, Paul C.; Memon, Bilal ; (b): Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, Davida; Byrd, Bruce Akram, Raquel; Fritsch, Patricia; de Klerk, Steve; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Mehta, Sanjana; Jones, Raquel; Patton, Roxanne M.; Masserant, Annette	(b): Brister, Luzine; Katti, Raghavendra	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000063	Ozdarski, Paul	9/25/2020	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000064	Ozdarski, Paul	9/25/2020	N/A			Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000065	Ozdarski, Paul	6/4/2019	Mehta, Sanjana	Kodamanchali, Madhu Sudhan; Mitchell, Mary - OGA; Wiley, Melanie Orr; Ozdarski, Paul; Kauffmann, Chris; Kuhn, Rick; Livermore, Amber L.; Forster, Joseph; Thomas, Jason		Attorney-Client Privilege; Work Product	Email thread between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000066	Ozdarski, Paul	(a): 5/31/2019; (b) 5/2/2019	(a), (b): Kodamanchali, Madhu Sudhan	(a): Thomas, Jason ; (b): Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, Davida; Byrd, Bruce Akram, Raquel; Fritsch, Patricia; de Klerk, Steve; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Mehta, Sanjana; Jones, Raquel; Patton, Roxanne M.; Masserant, Annette	(a): Kauffmann, Chris; Mehta, Sanjana; Ozdarski, Paul ; (b): Brister, Luzine; Katti, Raghavendra	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000067	Ozdarski, Paul	6/4/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000068	Ozdarski, Paul	6/4/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation

BCBSM-Tiara_Priv_000069	Ozdarski, Paul	(a): 5/31/2019; (b) 5/2/2019	(a), (b): Kodamanchali, Madhu Sudhan	(a): Thomas, Jason; (b): Deepick, Hank, Claiborne, George; Thomas, Jason; Bridges, Michael w; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.; Forster, Joseph; Kauffmann, Chris; Delaney, Nadiya; Malmgren, Dianne; Leonard, Davida; Byrd, Bruce Akram, Raquet; Fritsch, Patricia; de Klerk, Steve; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Rabideau, Renee; Marshall, Tressa; Mehta, Sanjana; Jones, Raquet; Patton, Roxanne M.; Masserant, Annette	(a): Kauffmann, Chris; Mehta, Sanjana; Ozdarski, Paul; (b): Brister, Luzine; Katti, Raghavendra	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000070	Ozdarski, Paul	6/4/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000071	Ozdarski, Paul	6/4/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000072	Ozdarski, Paul	(a): 6/19/2019; (b), (c): 6/18/2019	(a): Sabatella, Annette; (b): Sabatella, Annette; (c): Vogel, Michelle	(a): Vogel, Michelle; (b) Vogel, Michelle; (c): Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin	(a), (b): Rubleski, Jeff; Byrd, Bruce; Malmgren, Dianne; Stanko, Kevin; Siebers, Carl; Ozdarski, Paul	Attorney-Client Privilege	Email thread between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000073	Ozdarski, Paul	6/19/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000074	Sabatella, Annette	12/4/2019	Vogel, Michelle	Sabatella, Annette	Stanko, Kevin; Siebers, Carl; Fullerton, Michelle	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000075	Sabatella, Annette	12/5/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000076	Sabatella, Annette	6/10/2019	Vogel, Michelle	Vogel, Michelle; Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000077	Sabatella, Annette	6/10/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000078	Sabatella, Annette	6/10/2019	Vogel, Michelle	Vogel, Michelle; Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation

BCBSM-Tiara_Priv_000079	Sabatella, Annette	6/10/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000080	Sabatella, Annette	6/10/2019	Vogel, Michelle	Vogel, Michelle; Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000081	Sabatella, Annette	6/10/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000082	Sabatella, Annette	12/4/2019	Vogel, Michelle	Sabatella, Annette	Stanko, Kevin; Siebers, Carl; Fullerton, Michelle	Attorney-Client Privilege; Work Product	Email thread between BCBSM employees sharing materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000083	Sabatella, Annette	12/20/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000084	Sabatella, Annette	6/19/2019	Vogel, Michelle	Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin; Vogel, Michelle		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000085	Sabatella, Annette	6/19/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000086	Sabatella, Annette	6/18/2019	Vogel, Michelle	Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000087	Sabatella, Annette	6/18/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000088	Sabatella, Annette	6/19/2019	Vogel, Michelle	Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000089	Sabatella, Annette	6/19/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_Priv_000090	Sabatella, Annette	6/18/2019	Vogel, Michelle	Sabatella, Annette; Rubleski, Jeff; Malmgren, Dianne; Byrd, Bruce; Stanko, Kevin		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing materials prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation

BCBSM-Tiara_Priv_000091	Sabatella, Annette	6/18/2019	N/A			Attorney-Client Privilege; Work Product	Materials prepared at the direction of BCBSM in-house counsel Kevin Stanko for the purpose of securing legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
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Bates Beg	Custodian	Date	Email From	Email To	Email CC	Privilege Type	Privilege Description
BCBSM-Tiara_002824	Bouman, Joan	6/25/2018	Bouman, Joan	Fine, Robert E. (a): Simmer, Thomas M.D.; Johnson, Jerry M.D.; Savage, Juanita E.; Engler, Ann M.; Cleaver, Maya; Liu, Kathy; Crowell, Daniel L.; Varnier, Lisa; Henderson, Bruce; Lusk, Richard; Gawronski, Carol; Green, Ethel Denise; Gase, Deborah A.; Jones-Schneider, Kimberly; (b): Kapoor, Atul; Simmer, Thomas M.D.; Johnson, Jerry M.D.; Savage, Juanita E.; Engler, Ann M.; Cleaver, Maya; Liu, Kathy; Crowell, Daniel L.; Varnier, Lisa; Henderson, Bruce; Lusk, Richard; Gawronski, Carol; Green, Ethel Denise; Gase, Deborah A.; Jones-Schneider, Kimberly	Vantorre-Tellier, Michelle	Attorney-Client Privilege	Email from Joan Bouman to in-house counsel Robert Fine requesting legal advice regarding use of Non-Disclosure Agreements
BCBSM-Tiara_005283	Gawronski, Carol	(a): 10/29/2018; (b): 10/16/2018	(a): Kapoor, Atul; (b): Koroly, Anne	(a): Liu, Kathy; Cleaver, Maya; Lusk Richard W.; Albert, Peter G.; Savage, Juanita E.; DiFranco, Duane J. MD; McPhail, Cathleen; Cantara, Diane; Varnier, Lisa; Gawronski, Carol; Rabideau, Renee; Henderson, Bruce; Sabatella, Annette; Jones-Schneider, Kimberly; Crowell, Daniel L.; Malmgren, Dianne; Burnett, Nina A.; DiLellis, Peter; Hicks, Kamia; Kapoor, Atul; Gregory, Amanda E.; Wood, Judith; Gase, Deborah A.; Greene Ethel Denise; Klopfer, Marsha; Wilson, Gwendolyn; Siebers, Carl; Shankin, Arthur A.; (b): Cleaver, Maya; Lusk, Richard W.; Albert, Peter G.; Savage, Juanita E.; DiFranco, Duane J. MD; McPhail, Cathleen; Cantara, Diane; Varnier, Lisa; Gawronski, Carol; Rabideau, Renee; Henderson, Bruce; Sabatella, Annette; Jones-Schneider, Kimberly; Crowell, Daniel L.; Malmgren, Dianne; Burnett, Nina A.; Ozdarski, Paul; DiLella, Peter; Hicks, Kamia; Kapoor, Atul; Gregory, Amanda E.; Wood, Judith; Gase, Deborah A.; Greene, Ethel Denise; Klopfer, Marsha; Wilson, Gwendolyn; Siebers, Carl; Shankin, Arthur A.	(a): Malmgren, Dianne; Ozdarski, Paul; Siebers, Carl; (b): Malmgren, Dianne; Ozdarski, Paul	Attorney-Client Privilege	Email between BCBSM employees and BCBSM in-house counsel Bruce Henderson summarizing meeting in which counsel provided legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_004586	Hopper, Robert	(a): 11/13/2018; (b): 10/30/2018	(a): Ozdarski, Paul; (b): Liu, Kathy	Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege; Work Product	Email between BCBSM employees and BCBSM in-house counsel Bruce Henderson sharing information regarding VIP 108 K flip logic removal for purposes of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_004342	Hopper, Robert	9/19/2017	Hopper, Robert	(a): Maier, Chris; Ozdarski, Paul; (b): Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege; Work Product	Email between BCBSM employees that in line item 3 shares legal advice from BCBSM Office of General Counsel regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_005212	Jones-Schneider, Kimberly	(a): 9/22/2017; (b): 9/19/17	(a): Jones-Schneider, Kimberly; (b): Hopper, Robert	(a): Kapoor, Atul; Simmer, Thomas M.D.; Johnson, Jerry M.D.; Savage, Juanita E.; Engler, Ann M.; Cleaver, Maya; Liu, Kathy; Crowell, Daniel L.; Varnier, Lisa; Henderson, Bruce; Lusk, Richard; Gawronski, Carol; Greene, Ethel Denise; Gase, Deborah A.; Jones-Schneider, Kimberly; (b): Kauffmann, Chris; Uetaneley, Nadia; Malmgren, Dianne; Leonard, David; Byrd, Bruce; Akram, Raquel; Fritsch, Patricia; de Klerk, Steve; Stewart, Phyllis; Beauregard, Maureen Ellen; Azar, Lydia; Kapoor, Atul; Smith, Juliet; Smith, Debra; Vitale, Janet; Long, Richard W.; Livermore, Amber L.; Ozdarski, Paul; Nagy, Karol; Panetta, Mary; Marshall, Tressa; Kodamanchali, Madhu Sudhan; MAsserant, Annette; Mehta, Sanjana; Jones, Raquel; Rabideau, Renee; Patton, Roxanne M.		Attorney-Client Privilege; Work Product	Email from BCBSM employee Kimberly Jones-Schneider describing nature of meeting with BCBSM in-house attorney Kevin Stanko held for the purposes of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_004386	Ozdarski, Paul	(a): 10/24/18; (b): 10/22/18	(a): Ozdarski, Paul; (b): Kapoor, Atul	(a): Malmgren, Dianne; (b): Malmgren, Dianne; Ozdarski, Paul		Attorney-Client Privilege; Work Product	Emails between BCBSM employees and BCBSM in-house counsel Bruce Henderson sharing information regarding VIP 108 K flip logic removal for purposes of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_004746	Ozdarski, Paul	4/29/2019	Kauffmann, Chris	Katti, Raghavendra; Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael W.; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing information prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_004752	Ozdarski, Paul	4/29/2019	Kauffmann, Chris	Katti, Raghavendra; Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael W.; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing information prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_004758	Ozdarski, Paul	4/29/2019	Kauffmann, Chris	Katti, Raghavendra; Doecker, Mark; Claiborne, George; Thomas, Jason; Bridges, Michael W.; Moriarty, John; Brown, John L.; Lukasiewicz, Denise; Skupny, Edward; Stanko, Kevin; Wood, Judith; Gregory, Amanda E.		Attorney-Client Privilege; Work Product	Email between BCBSM employees including BCBSM in-house counsel Kevin Stanko sharing information prepared at the direction of Stanko for the purpose of securing legal advice regarding abusive billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001285	Dianne Malmgren	(a): 2/6/18; (b): 2/5/18; (c): 2/5/18; (d): 2/5/18	(a): Thomas, Jason; (b): Parmley, Laurine; (c): Samuels, Michele; (d) Thomas, Jason	(a): Savage, Juanita E.; Brister, Luzine; (b): Samuels, Michele; Thomas, Jason; (c): Thomas, Jason; Parmley, Laurine; (d) Parmley, Laurine	(b): Gipson, Sharon; Jenkins, Rosina D.; O'Neal, Scott; (c): Gipson, Sharon; Jenkins, Rosina D.; (d): Samuels, Michele; Gipson, Sharon; Jenkins, Rosina D.	Attorney-Client Privilege	Email thread between 8 CBBSM employees sharing legal advice from BCBSM Vice President and General Counsel Laraine Symula Parmley regarding contracts that allow balance billing
BCBSM-Tiara_001289	Dianne Malmgren	(a): 2/6/18; (b): 2/5/18; (c): 2/5/18; (d): 2/5/18	(a): Thomas, Jason; (b): Parmley, Laurine; (c): Samuels, Michele; (d) Thomas, Jason	(a): Savage, Juanita E.; Brister, Luzine; (b): Samuels, Michele; Thomas, Jason; (c): Thomas, Jason; Parmley, Laurine; (d) Parmley, Laurine	(b): Hopper, Robert; Jenkins, Rosina D.; Turman, Denise; (b): Gipson, Sharon; Jenkins, Rosina D.; O'Neal, Scott; (c): Gipson, Sharon; Jenkins, Rosina D.; (d): Samuels, Michele; Gipson, Sharon; Jenkins, Rosina D.	Attorney-Client Privilege	Email thread between 8 CBBSM employees sharing legal advice from BCBSM Vice President and General Counsel Laraine Symula Parmley regarding contracts that allow balance billing
BCBSM-Tiara_001548	Rod Begosa; Robert Hopper	7/26/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis	Arkam, Raquel; Murphy, Kewanda; Washington, Carla	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001555	Kimberly Jones-Schneider; Robert Hopper	7/26/2017	Ozdarski, Paul	Jones-Schneider, Kimberly		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001559	Dennis Wegner; Dianne Malmgren	7/27/2017	Malmgren, Dianne	Malmgren, Dianne; Stanko, Kevin; Malik, David, R.; Harrison, Larry; Akram, Raquel	Begosa, Rod	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001560	Kimberly Jones-Schneider; Paul Ozdarski	7/27/2017	Ozdarski, Paul	Jones-Schneider, Kimberly; Dobson, Ray		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001563	Kimberly Jones-Schneider; Paul Ozdarski	(a) 7/27/17; (b) 7/27/17	(a): Dobson, Ray; (b): Ozdarski, Paul	(a): Ozdarski, Paul; Jones-Schneider, Kimberly; (b): Jones-Schneider, Kimberly; Dobson, Ray		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001566	Kimberly Jones-Schneider; Paul Ozdarski	(a) 7/28/17; (b) 7/27/17; (c) 7/27/17	(a) Ozdarski, Paul; (b): Dobson, Ray; (c): Ozdarski, Paul	(a): Dobson, Ray; Jones-Schneider, Kimberly; (b): Ozdarski, Paul; Jones-Schneider, Kimberly; (c): Jones-Schneider, Kimberly; Dobson, Ray		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation

BCBSM-Tiara_001570	Kimberly Jones-Schneider; Paul Ozdarski	(a): 7/28/17; (b): 7/28/17; (c): 7/27/17; (d): 7/27/17	(a): Dobson, Ray; (b): Ozdarski, Paul; (c): Dobson, Ray; (d): Ozdarski, Paul	(a): Ozdarski, Paul; (b): Dobson, Ray; Jones-Schneider, Kimberly; (c): Ozdarski, Paul; Jones-Schneider, Kimberly; (d): Jones-Schneider, Kimberly; Dobson, Ray	(a): Jones-Schneider, Kimberly	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001575	Dennis Wegner; David Malik; Dianne Malmgren	(a): 7/28/17; (b): 7/26/17	(a): Stanko, Kevin; (b): Malmgren, Dianne	(a): Malmgren, Dianne; Malik, David R.; Wegner, Dennis; (b): Malik, David R.; Wegner, Dennis	(a), (b): Akram, Raquel; Murphy, Kewanda; Washington, Carla	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001578	Dianne Malmgren	7/26/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis	Akram, Raquel; Murphy, Kewanda; Washington, Carla (b): Washington, Carla; Murphy, Kewanda; Miller, Carolyn; Akram, Raquel; (b): Washington, Carla; Murphy, Kewanda; Miller, Carolyn; Akram, Raquel; (c): Malmgren, Dianne; Washington, Carla; Murphy, Kewanda; Miller, Carolyn; (d): Malmgren, Dianne; Washington, Carla; Murphy, Kewanda; Miller, Carolyn	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001581	Dennis Wegner; Dianne Malmgren	(a): 8/2/17; (b): 8/2/17; (c): 8/2/17; (d): 8/1/17	(a): Varnier, Lisa; (b): Malmgren, Dianne; (c): Varnier, Lisa; (d): Akram, Raquel	(a): Malmgren, Dianne; (b): Varnier, Lisa; (c): Akram, Raquel; (d): Varnier, Lisa	Akram, Raquel; Murphy, Kewanda; Washington, Carla	Attorney-Client Privilege	Email thread between BCBSM employees and BCBSM in-house counsel Lisa Varnier seeking and providing legal advice related to reimbursement for non-participating labs for mental health and substance abuse diagnosis codes
BCBSM-Tiara_001584	Michele Montagano Roegner	8/8/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001586	Karol Nagy	(a): 8/9/17; (b): 08/08/17	(a) Nagy, Karol ; (b) Malmgren, Dianne	(a) Marshall, Tressa; Smith, Debra; (b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001588	Larry Harrison; Teresa Henry	(a): 8/9/17; (b): 08/08/17	(a): Harrison, Larry; (b): Malmgren, Dianne	(a): Henry, Teresa; (b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin	(a): Gentmer, Donald	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001590	Michele Montagano Roegner; Paul Ozdarski	8/8/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001592	Michele Montagano Roegner; Paul Ozdarski	8/8/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001595	Dianne Malmgren	8/8/2017	Malmgren, Dianne	Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001597	Karol Nagy	(a): 8/10/17; (b): 08/08/17	(a): Montagano Roegner, Michele M.; (b): Malmgren, Dianne	(a): Malmgren, Dianne; (b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin	(a): Wood, Judith; Nagy, Karol; Herman, Victoria; Malik, David R.; Wegner, Dennis; Boillat, Erik L.; Harrison, Larry; Stanko, Kevin; Smith, Debra	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001600	Rod Begosa; Michele Montagano Roegner	10/10/2017	Montagano Roegner, Michele M.	Montagano Roegner, Michele M.; Malmgren, Dianne; Wood, Judith; Nagy, Karol; Malik, David R.; Wegner, Dennis; Boillat, Erik L.; Harrison, Larry; Stanko, Kevin	Herman, Victoria; Smith, Debra	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001601	Michele Montagano Roegner; Teresa Henry; Paul Welch	10/10/2017	Montagano Roegner, Michele M.	Montagano Roegner, Michele M.; Malmgren, Dianne; Wood, Judith; Nagy, Karol; Malik, David R.; Wegner, Dennis; Boillat, Erik L.; Harrison, Larry; Stanko, Kevin	Herman, Victoria; Smith, Debra	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001602	Erik Boillat; Larry Harrison; Teresa Henry; Paul Welch	(a): 8/10/17; (b): 08/08/17	(a): Montagano Roegner, Michele M.; (b): Malmgren, Dianne	(a): Malmgren, Dianne; (b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin	(a): Wood, Judith; Nagy, Karol; Herman, Victoria; Malik, David R.; Wegner, Dennis; Boillat, Erik L.; Harrison, Larry; Stanko, Kevin; Smith, Debra	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001605	Erik Boillat; Larry Harrison; Teresa Henry; Paul Welch	(a): 8/10/17; (b): 08/08/17	(a): Montagano Roegner, Michele M.; (b): Malmgren, Dianne	(a): Malmgren, Dianne; (b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin	(a): Wood, Judith; Nagy, Karol; Herman, Victoria; Malik, David R.; Wegner, Dennis; Boillat, Erik L.; Harrison, Larry; Stanko, Kevin; Smith, Debra	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001619	Carol Gawronski; Dianne Malmgren	9/14/2017	Hopper, Robert	Gawronski, Carol		Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001624	Gary Gavin; Lori Shannon; Robert Hopper	9/19/2017	Hopper, Robert	Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege	Email between BCBSM employees that in line item 3 shares legal advice from BCBSM Office of General Counsel regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_001627	Gary Gavin; Lori Shannon; Robert Hopper	9/19/2017	Hopper, Robert	Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege	Email between BCBSM employees that in line item 3 shares legal advice from BCBSM Office of General Counsel regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_001630	Gary Gavin; Lori Shannon	9/19/2017	Hopper, Robert	Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege	Email between BCBSM employees that in line item 3 shares legal advice from BCBSM Office of General Counsel regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_001637	Lori Shannon; Rod Begosa	9/19/2017	Hopper, Robert	Braund, Pamela A.; Hopper, Robert; Fester, Sandra; Friedkin, Aaron; Gavin, Gary; Hoyer, Jason M.; McKay, Jr., Michael; Ragos, Paul E.; Rizzo, Robert; Shannon, Lori; VanEck, Diane; Connolly, Jeffrey		Attorney-Client Privilege	Email between BCBSM employees that in line item 3 shares legal advice from BCBSM Office of General Counsel regarding abusive billing practices on certain types of out-of-state non-participating provider claims
BCBSM-Tiara_001654	Karol Nagy	(a): 9/25/2017; (b): 08/08/17	(a): Nagy, Karol ; (b) Malmgren, Dianne	(a): Marshall, Tressa; (b): Malmgren, Dianne	(b): Malik, David R.; Wegner, Dennis; Wood, Judith; Montagano, Roegner, Michele M.; Boillat, Erik L.; Harrison, Larry; Nagy, Karol; Stanko, Kevin	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation
BCBSM-Tiara_001689	Carol Gawronski	10/24/2017	Gawronski, Carol	Armstrong, Brian	Malmgren, Dianne	Attorney-Client Privilege; Work Product	Materials compiled at the direction of BCBSM in-house counsel Kevin Stanko in order to enable counsel to provide legal advice regarding abusive provider billing practices on certain types of out-of-state non-participating provider claims in anticipation of potential litigation