

**IN THE CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA**

KENNETH MANFREDI, SR.,
KENNETH MANFREDI, JR.,
and ALEXANDER LIEBSTER as Trustee
For the Estate of Ernesto Liebster

Plaintiffs,

CASE NO. 13-024268-CA 01

v.

KOBALTEK, INC, an inactive Florida Corporation,
MILLENIUM LOCK INC. d/b/a ULTIMATE
LOCK SYSTEMS, a Texas Corporation; DARREN
BAYSINGER, individually; RON DANIELS,
individually; and Joseph Titone, individually,

Defendants.

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DEFENDANTS' PRIVILEGE LOG

COME NOW the Defendants Kobaltek, Inc., Darren Baysinger, and Joe Titone, by and through their undersigned counsel, and file this Privilege Log pursuant to Florida Rule of Civil Procedure 1.280(b)(5):

**MATERIALS PROTECTED BY DEFENDANTS' ASSERTION OF ATTORNEY-CLIENT
PRIVILEGE PURSUANT TO FLORIDA STATUTE SEC. 90.502**

- INVOICE – April 8, 2011 – Mediation services – From Laurie L. Reimer, Esq. to Joe Titone – Kobaltek v. DTS
- LETTER – April 8, 2011 – Mediation services - From Laurie L. Reimer, Esq. to Joe Titone – Kobaltek v. DTS
- INVOICE – February 9, 2011 – Subpoena service – from Intercounty Subpoena to Joe Titone
- RETAINER AGREEMENT – October 8, 2010 -Legal representation – Joe Titone, Attorney to represent Kobaltek, Inc.

Defendants respectfully request that this Court permit them to file an amended log should they become aware in the future of any other documents requested by Plaintiffs upon which Defendants claim a privilege.

/s/ Joe Titone

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/s/ Steve Mankodi

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[REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served on August 27, 2014 upon George C. Paladis, Esq., & Michael J. Reppas, Esq., Law Office of Michael J. Reppas, [REDACTED], 7850 NW 146TH Street, Suite 501, Miami Lakes, Florida 33016.