

UNITED STATES COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 9:20-cv-81254-WPD

JAY MOLBOGOT,

Plaintiff,

vs.

MARINEMAX EAST, INC.,

Defendant.

**SUPPLEMENTAL RESPONSES AND OBJECTIONS OF NON-PARTY SEA RAY
BOATS, INC. TO PLAINTIFF JAY MOLBOGOT'S SUBPOENA**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure and Local Rule 26.1, non-party Sea Ray Boats, Inc. ("Sea Ray"), by and through undersigned counsel, hereby serves its Supplemental Responses and Objections to the Subpoena of Plaintiff Jay Molbogot ("Plaintiff" or "Molbogot") dated September 23, 2020 (with all attachments, the "Subpoena"), which Subpoena purports to notice a production and inspection of documents for October 19, 2020, and improperly requests the production of certain documents.

PRELIMINARY OBJECTIONS

1. Sea Ray objects to the Subpoena because it is overly broad and unduly burdensome and expensive, taking into account the needs of the case, and is otherwise not proportional to the needs of the case, particularly as to Sea Ray, who is a *non-party* in this action.

2. Sea Ray objects to the Subpoena because compliance with the Subpoena would require a significant amount of time and resources and would impose an undue burden and expense on Sea Ray. Further, and more specifically, Sea Ray objects to the Subpoena inasmuch as, upon information and belief, the Subpoena is duplicative of and requests substantially the same

information as information that could be sought from the Defendant in discovery in the underlying lawsuit from which the Subpoena arises.

3. Sea Ray objects to the Subpoena on the basis that the Subpoena subjects Sea Ray to an undue burden and expense and is unreasonable and oppressive as set forth in Rule 45(d)(1) of the Federal Rules of Civil Procedure, particularly given the scope of the underlying litigation, the limited information – if any – that Sea Ray possesses, and the significant costs Sea Ray would incur in responding to the Subpoena.

4. Sea Ray further objects on the basis that Plaintiff issued the Subpoena for purposes of delay and to cause annoyance, embarrassment, oppression, and undue burden.

5. Sea Ray objects to the Subpoena because it seeks to impose duties or responsibilities upon Sea Ray beyond those imposed by the Federal Rules of Civil Procedure.

6. Sea Ray objects to the Subpoena because it is vague, indefinite, uncertain, or ambiguous and cannot reasonably be answered.

7. Sea Ray objects to definition 1 of the Subpoena because it is overly broad, unduly burdensome, vague, ambiguous, and inapplicable to Sea Ray where it defines “You” and “Your” to include “MarineMax” and appears to include in the scope of the terms “You” and “Your” the “Defendant, MARINEMAX EAST, INC. and includes its agents, officers, representatives and employees.”

8. Sea Ray objects to definition 3 as overbroad and unduly burdensome because it defines “Sea Ray” to include “its agents.”

9. Sea Ray objects to definition 4 as overbroad and unduly burdensome because it defines “Brunswick” to include “its agents.”

10. These objections and any accompanying responses are submitted by Sea Ray

subject to, and without waiving or intending to waive, but on the contrary, intending to reserve and reserving:

a. All questions as to competency, relevancy, materiality, privilege, and admissibility as evidence for any purpose of any of the documents referred to or answers given, or the subject matter thereof in any subsequent proceeding, or in the trial or any other action or proceeding;

b. The right to object to other discovery procedures involving or relating to the subject matter of the Subpoena and the document requests therein; and

c. The right at any time to revise, correct, add to, or clarify any of the objections or responses set forth herein or documents referred to herein.

These “Preliminary Objections” are applicable to and incorporated by reference in each of Sea Ray’s objections and responses herein, as if specifically and fully set forth therein. The stating of specific objections to a particular request shall not be construed as a waiver of Sea Ray’s “Preliminary Objections.” Additionally, unless otherwise specifically stated, Sea Ray’s objections to the Subpoena and each request therein apply to the entirety of each request to which the objection is made.

**SUPPLEMENTAL RESPONSES AND OBJECTIONS TO SUBPOENA AND
DOCUMENT REQUESTS**

Subject to and incorporating the foregoing Preliminary Objections, Sea Ray responds and objects as follows:

1. All emails between Sea Ray and MarineMax discussing the Vessel from April 1, 2017 through October 31, 2018.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege, Work Product Doctrine, Joint Defense Agreement and/or Common Legal Interest doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: None in Sea Ray's possession, custody, or control.

2. All emails between Sea Ray and MarineMax discussing the Vessel from October 31, 2018 through August 1, 2020.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege, Work Product Doctrine, Joint Defense Agreement and/or Common Legal Interest doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: Subject to and without waiving the above-mentioned objections, a revised privilege log with additional information is being produced contemporaneously with this production.

3. All emails between Sea Ray and Brunswick discussing the Vessel from April 1, 2017 through October 31, 2018

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege and/or Work Product Doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: None in Sea Ray's possession, custody, or control.

4. All emails between Sea Ray and Brunswick discussing the Vessel from October 31, 2018 through August 1, 2020.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege and/or Work Product Doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: Subject to and without waiving the above-mentioned objections, a revised privilege log with additional information is being produced contemporaneously with this production.

5. All word documents discussing each item in the Vessel that required repair/replacement from April 1, 2017 through October 31, 2018.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests documents that are subject to the Attorney Client Privilege and/or Work Product Doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: None in Sea Ray's possession, custody, or control.

6. All word documents discussing each item in the Vessel that required repair/replacement from October 31, 2018 through August 1, 2020.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests documents that are subject to the Attorney Client Privilege and/or Work Product Doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: Subject to and without waiving the above-mentioned objections, a revised privilege log with additional information is being produced contemporaneously with this production.

7. All communications between Sea Ray and Kohler discussing the Generator from April 1, 2017 through October 31, 2018.

RESPONSES: Sea Ray produces all responsive documents as SeaR_Molbogot_00001 to 00906.

SUPPLEMENTAL RESPONSES: None in Sea Ray's possession, custody, or control.

8. All communications between Sea Ray and Kohler discussing the Generator from October 31, 2018 through August 1, 2020.

RESPONSES: Sea Ray produces all responsive documents as SeaR_Molbogot_00001 to 00906.

9. All emails between Sea Ray and MarineMax discussing Jay Molbogot from April 1, 2017 through October 31, 2018.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege, Work Product Doctrine, Joint Defense Agreement and/or Common Legal Interest doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: None in Sea Ray's possession, custody, or control.

10. All emails between Sea Ray and MarineMax discussing Jay Molbogot from October 31, 2018 through August 1, 2020.

RESPONSES & OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege, Work Product Doctrine, Joint Defense Agreement and/or Common Legal Interest doctrine. Subject to and without waiving those objections, Sea Ray produces all responsive, non-privileged documents as SeaR_Molbogot_00001 to 00906. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: Subject to and without waiving the above-mentioned objections, a revised privilege log with additional information is being produced contemporaneously with this production.

11. All bills and/or requests for payment received by Sea Ray from MarineMax concerning warranty repairs completed on the Vessel from April 1, 2017 through August 1, 2020.

OBJECTION: Sea Ray objects to this request as it is overbroad and unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, as payments between Sea Ray and MarineMax are not relevant to the underlying lawsuit. Furthermore, this request seeks sensitive information regarding pricing that is confidential and proprietary in nature.

SUPPLEMENTAL RESPONSES: In addition to any responsive documents in Sea Ray's prior production, Sea Ray produces the document bates-labeled as SeaR_Molbogot_00907, with confidential pricing information redacted.

12. All reports relating to the electrical surveyor who inspected the Vessel on June 5, 2020.

OBJECTION: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege and/or Work Product Doctrine. A privilege log is being produced contemporaneously with this production.

SUPPLEMENTAL RESPONSES: Subject to and without waiving the above-mentioned objections, a revised privilege log with additional information is being produced contemporaneously with this production.

13. All documents and communications concerning the Equipment Leakage Circuit Interrupters (ELCI) Breaker of the Vessel.

OBJECTION: Sea Ray objects to this request as it is overbroad and unduly burdensome, as it seeks “all documents and communications concerning the Equipment Leakage Circuit Interrupters (ELCI) Breaker of the Vessel,” without providing meaningful limitations or parameters. Furthermore, the request is vague.

SUPPLEMENTAL RESPONSES: Sea Ray objects to this request to the extent that it requests correspondence subject to the Attorney Client Privilege and/or Work Product Doctrine. A revised privilege log with additional information is being produced contemporaneously with this production. Subject to and without waiving that objection, the responsive and non-privileged documents in Sea Ray’s possession, custody, or control have been previously produced, including SeaR_Molbogot-00001, 00002, 00007, and 00718.

Dated: January 21, 2021

Respectfully submitted,

K&L GATES LLP

Counsel for Non-Party Sea Ray Boats, Inc.

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Facsimile: 305-358-7095

Email molbogot-brunswick@klgates.com

By: /s/ Christina M. Paul

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served to all counsel of record on the below service list via Electronic Mail on the 21st day of January, 2021.

/s/ Christina M. Paul

Service List

Case No. Case No. 9:20-cv-81254-WPD

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Tel: 561-855-7585

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**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

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Tampa, FL 33602

Tel: 813-898-1800

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Jay Molbogot v. MarineMax East, Inc.; (Case No. 9:20-cv-81254-WPD)

Non-Party Sea Ray Boats, Inc. Privilege Log

Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
1	SearR_Molbogot_00001	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Rick Bressner <rick.bressner@searay.com>	Dexter Howe <dexter.howe@searay.com>		3/3/2020	Attorney-Client Privilege / Portions of conversations with Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
2	SearR_Molbogot_00005	Raustad, Larry	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>	Dexter Howe <dexter.howe@searay.com>		3/2/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
3	SearR_Molbogot_00010	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Floyd Goddard <fgoddard@searay.com> Kate Schumacher <kate.schumacher@searay.com> Randy Miller <rmiller@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com> Scott Ward <scott.ward@brunswick.com>		2/26/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
4	SearR_Molbogot_00015	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Gary Webb <gary.webb@brunswick.com> Ron Fiesta <ron.fiesta@brunswick.com>		2/21/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
5	SearR_Molbogot_00021	Raustad, Larry	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>	Gary Webb <gary.webb@brunswick.com> Ron Fiesta <ron.fiesta@brunswick.com>		2/21/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
6	SearR_Molbogot_00027	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Rick Castellini <rick.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com> James Turowsky <james.turowsky@marinemax.com>		7/22/2020	Attorney-Client Privilege / Portion Discussing Legal Advice Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
7	SearR_Molbogot_00067	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>			7/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
8		Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Cote Marine LLC <cotemarine@att.net>	Dexter Howe <dexter.howe@searay.com> Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com> Kate Schumacher <kate.schumacher@searay.com>		6/8/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
9		Raustad, Larry	pdf					6/8/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
10		Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	James Turowsky <james.turowsky@marinemax.com> Rick Castellini <rick.castellini@marinemax.com>	Cote Marine LLC <cotemarine@att.net> Dexter Howe <dexter.howe@searay.com>		6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
11		Raustad, Larry	Email	Cote Marine LLC <cotemarine@att.net>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com> Tom Claybaugh <tclaybaugh@searay.com>			6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
12		Raustad, Larry	Email	Dexter Howe <dexter.howe@searay.com>	Cote Marine LLC <cotemarine@att.net> Larry Raustad <lraustad@searay.com> Tom Claybaugh <tclaybaugh@searay.com>			6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
13		Raustad, Larry	rtf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.

Jay Molbogot v. MarineMax East, Inc.; (Case No. 9:20-cv-81254-WPD)

Non-Party Sea Ray Boats, Inc. Privilege Log

Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
14		Raustad, Larry	rif					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
15		Raustad, Larry	rif					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
16		Raustad, Larry	JPG					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
17		Raustad, Larry	JPG					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
18		Raustad, Larry	Email	Dexter Howe <dexter.howe@searay.com>	Cote Marine LLC <cotemarine@att.net> Larry Raustad <lraustad@searay.com> Tom Claybaugh <tclaybaugh@searay.com>			6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
19		Raustad, Larry	pdf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
20		Raustad, Larry	pdf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
21		Raustad, Larry	pdf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
22		Raustad, Larry	pdf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
23		Raustad, Larry	pdf					6/2/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
24	SeaR_Molbogot_00229	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Kate Schumacher <kate.schumacher@searay.com>		6/24/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
25	SeaR_Molbogot_00235	Raustad, Larry	Email	Kate Schumacher <kate.schumacher@searay.com>	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>		6/24/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
26	SeaR_Molbogot_00241	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com> Kate Schumacher <kate.schumacher@searay.com>			6/24/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
27	SeaR_Molbogot_00246	Raustad, Larry	doc					6/24/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Draft communication re vessel crafted by legal department in anticipation of litigation.
28	SeaR_Molbogot_00268	Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Kate Schumacher <kate.schumacher@searay.com> Larry Raustad <lraustad@searay.com>		6/23/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
29	SeaR_Molbogot_00273	Raustad, Larry	doc					6/23/2020	Attorney-Client Privilege / Work Product	Draft communication re vessel crafted by legal department in anticipation of litigation.

Jay Molbogot v. MarineMax East, Inc.; (Case No. 9:20-cv-81254-WPD)

Non-Party Sea Ray Boats, Inc. Privilege Log

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30		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Kate Schumacher <kate.schumacher@searay.com>	Jamie Varop (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.varop@brunswick.com>		6/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
31		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Dexter Howe <dexter.howe@searay.com> Tom Claybaugh <tclaybaugh@searay.com>	Cote Marine LLC <cotemarine@att.net>		6/22/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
32		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Rick Castellini <rck.castellini@marinemax.com>	Cote Marine LLC <cotemarine@att.net> Dexter Howe <dexter.howe@searay.com> James Turowsky <james.turowsky@marinemax.com>		5/29/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
33		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	cotemarine@att.net	Dexter Howe <dexter.howe@searay.com>		5/29/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
34		Raustad, Larry	Email	Cote Marine LLC <cotemarine@att.net>	Larry Raustad <larry.raustad@searay.com>	Dexter Howe <dexter.howe@searay.com>		5/28/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
35		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	cotemarine@att.net	Dexter Howe <dexter.howe@searay.com>		5/28/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
36		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Cote Marine LLC <cotemarine@att.net>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <larry.raustad@searay.com>		5/28/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
37		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Rick Castellini <rck.castellini@marinemax.com>	Cote Marine LLC <cotemarine@att.net> Dexter Howe <dexter.howe@searay.com> James Turowsky <james.turowsky@marinemax.com>		5/28/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
38	SeaR_Molbogot_00275	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Rick Castellini <rck.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com>		5/27/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
39	SeaR_Molbogot_00286	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Rick Castellini <rck.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com>		5/26/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
40	SeaR_Molbogot_00309	Raustad, Larry	Email	Kate Schumacher <kate.schumacher@searay.com>	Larry Raustad <larry.raustad@searay.com>	Kate Schumacher <kate.schumacher@searay.com>		5/26/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
41	SeaR_Molbogot_00322	Raustad, Larry	Email	Dexter Howe <dexter.howe@searay.com>	Larry Raustad <larry.raustad@searay.com>			5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
42		Raustad, Larry	Email	Dexter Howe <dexter.howe@searay.com>	Cote Marine LLC <cotemarine@att.net> Larry Raustad <larry.raustad@searay.com> Tom Claybaugh <tclaybaugh@searay.com>			6/3/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
43		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
44		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
45	SeaR_Molbogot_00336	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Dexter Howe <dexter.howe@searay.com>			5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.

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Non-Party Sea Ray Boats, Inc. Privilege Log

Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
46	SeaR_Molbogot_00369	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Rick Castellini <rick.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com> Manny Alvare <manny.alvare@marinemax.com>	Kate Schumacher <kate.schumacher@searay.com>	5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
47	SeaR_Molbogot_00393	Raustad, Larry	Email	Rick Castellini <rick.castellini@marinemax.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Larry Raustad <larry.raustad@searay.com>	Dexter Howe <dexter.howe@searay.com> Manny Alvare <manny.alvare@marinemax.com>		5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
48	SeaR_Molbogot_00425	Raustad, Larry	Email	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>	Larry Raustad <larry.raustad@searay.com> Rick Castellini <rick.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Manny Alvare <manny.alvare@marinemax.com>		5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
49	SeaR_Molbogot_00439	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Manny Alvare <manny.alvare@marinemax.com> Rick Castellini <rick.castellini@marinemax.com>		5/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
50	SeaR_Molbogot_00546	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Michael Divesti <michael.divesti@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Manny Alvare <manny.alvare@marinemax.com> Rick Castellini <rick.castellini@marinemax.com>		7/7/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
51		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Kate Schumacher <kate.schumacher@searay.com>	Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Kate Schumacher <kate.schumacher@searay.com>		6/19/2020	Attorney-Client Privilege	Communications with expert Cole Marine in anticipation of litigation.
52		Raustad, Larry	pdf			Larry Raustad <larry.raustad@searay.com>		6/19/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
53	SeaR_Molbogot_00606	Raustad, Larry	Email	Kate Schumacher <kate.schumacher@searay.com>	Larry Raustad <larry.raustad@searay.com>	Dexter Howe <dexter.howe@searay.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Tammie Chapman <tammie.chapman@searay.com>		6/18/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
54	SeaR_Molbogot_00618	Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Kate Schumacher <kate.schumacher@searay.com>	Dexter Howe <dexter.howe@searay.com> Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com> Larry Raustad <larry.raustad@searay.com> Tammie Chapman <tammie.chapman@searay.com>		6/18/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
55		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Accounts Payable - HQT <accounts.payable@brunswickboatgroup.com>	Dexter Howe <dexter.howe@searay.com> Kate Schumacher <kate.schumacher@searay.com> Michael Divesti <michael.divesti@brunswick.com>		6/18/2020	Attorney-Client Privilege / Work Product	Communications with expert Cole Marine in anticipation of litigation.
56		Raustad, Larry	pdf					6/18/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
57		Raustad, Larry	xls					6/18/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
58		Raustad, Larry	Email	Larry Raustad <larry.raustad@searay.com>	Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Kate Schumacher <kate.schumacher@searay.com>		6/12/2020	Attorney-Client Privilege	Communications with expert Cole Marine in anticipation of litigation.

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Non-Party Sea Ray Boats, Inc. Privilege Log

Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
59		Raustad, Larry	pdf					6/12/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
60		Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Dexter Howe <dexter.howe@searay.com>			6/12/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
61		Raustad, Larry	pdf					6/12/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
62		Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	Dexter Howe <dexter.howe@searay.com>			6/6/2020	Attorney-Client Privilege	Communications with expert Cote Marine in anticipation of litigation.
63		Raustad, Larry	pdf					6/8/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
64	SeaR_Malbogot_00647	Raustad, Larry	Email	Jamie Vargo (Claims and Litigation Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com> Scott Ward <scott.ward@brunswick.com>	Gary Webb <gary.webb@brunswick.com> Ron Fiesta <ron.fiesta@brunswick.com>		4/17/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
65		Raustad, Larry	Email	Dexter Howe <dexter.howe@searay.com>	Cote Marine LLC <cotemarine@att.net> Larry Raustad <lraustad@searay.com> Tom Claybaugh <tclaybaugh@searay.com>			6/3/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
66		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
67		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
68		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
69		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
70		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
71		Raustad, Larry	pdf					6/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
72		Raustad, Larry	Email	Rick Castellini <rck.castellini@marinemax.com>	Cote Marine LLC <cotemarine@att.net> James Turovsky <james.turovsky@marinemax.com> Larry Raustad <lraustad@searay.com>	Dexter Howe <dexter.howe@searay.com>		6/3/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
73		Raustad, Larry	Email	Cote Marine LLC <cotemarine@att.net>	James Turovsky <james.turovsky@marinemax.com> Larry Raustad <lraustad@searay.com> Rick Castellini <rck.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com>		6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
74		Raustad, Larry	Email	Cote Marine LLC <cotemarine@att.net>	James Turovsky <james.turovsky@marinemax.com> Larry Raustad <lraustad@searay.com> Rick Castellini <rck.castellini@marinemax.com>	Dexter Howe <dexter.howe@searay.com>		6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.
75		Raustad, Larry	Email	Larry Raustad <lraustad@searay.com>	James Turovsky <james.turovsky@marinemax.com> Rick Castellini <rck.castellini@marinemax.com>	Cote Marine LLC <cotemarine@att.net> Dexter Howe <dexter.howe@searay.com>		6/2/2020	Attorney-Client Privilege / Work Product	Communications with expert Cote Marine in anticipation of litigation.

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Non-Party Sea Ray Boats, Inc. Privilege Log

Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
76	SeaR_Molbogot_00688	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>			3/5/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
77	SeaR_Molbogot_00691	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>		3/5/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
78	SeaR_Molbogot_00693	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			3/6/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
79		Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Gary Webb <gary.webb@brunswick.com>	Dave Marlow <dave.marlow@brunswickboatgroup.com>		3/3/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
80		Vargo, Jamie	pdf					3/3/2020	Attorney-Client Privilege / Work Product	Expert's privileged analysis and work product commissioned in anticipation of litigation.
81	SeaR_Molbogot_00698	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Gary Webb <gary.webb@brunswick.com>			3/18/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
82	SeaR_Molbogot_00707	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/2/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
83	SeaR_Molbogot_00716	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			3/4/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
84	SeaR_Molbogot_00721	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			2/27/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
85	SeaR_Molbogot_00723	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>	Gary Webb <gary.webb@brunswick.com> Scott Ward <scott.ward@brunswick.com>		2/28/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
86	SeaR_Molbogot_00726	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com> Scott Ward <scott.ward@brunswick.com>	Gary Webb <gary.webb@brunswick.com> Ron Fiesta <ron.fiesta@brunswick.com>		4/17/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
87	SeaR_Molbogot_00787	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com> Scott Ward <scott.ward@brunswick.com>	Steve Chambers <steve.chambers@searay.com>		3/6/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
88	SeaR_Molbogot_00792	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com> Scott Ward <scott.ward@brunswick.com>	Steve Chambers <steve.chambers@searay.com>		3/6/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.

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Count	Produced Document Label	Custodian	DocType	Sender/Author	Recipient	CC	BCC	Sent Modified Date	Privilege Claim	Privilege Summary
89	SeaR_Molbogot_00797	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			3/6/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
90	SeaR_Molbogot_00811	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			3/5/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
91	SeaR_Molbogot_00815	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Rick Castellini <rick.castellini@marinemax.com>			3/5/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
92	SeaR_Molbogot_00819	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustad <lraustad@searay.com>	Gary Webb <gary.webb@brunswick.com> Scott Ward <scott.ward@brunswick.com>		3/17/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
93	SeaR_Molbogot_00828	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Scott Ward <scott.ward@brunswick.com>			3/18/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
94	SeaR_Molbogot_00830	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com>			3/19/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
95	SeaR_Molbogot_00832	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Manny Alvare <manny.alvare@marinemax.com>	Jennifer Davis <jennifer.davis@marinemax.com>		4/17/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
96	SeaR_Molbogot_00836	Vargo, Jamie	Attachment	Dexter Howe <dexter.howe@searay.com>	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustad <lraustad@searay.com> Scott Ward <scott.ward@brunswick.com>		4/17/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
97	SeaR_Molbogot_00840	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/16/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
98	SeaR_Molbogot_00847	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/16/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
99	SeaR_Molbogot_00853	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/16/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.
100	SeaR_Molbogot_00859	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Manny Alvare <manny.alvare@marinemax.com> Jennifer Davis <jennifer.davis@marinemax.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>		4/16/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal departments advancing common interest and joint defense in anticipation of litigation.

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Non-Party Sea Ray Boats, Inc. Privilege Log

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101	SeaR_Molbogot_00863	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Manny Alvarez <manny.alvarez@marinemax.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com> Jennifer Davis <jennifer.davis@marinemax.com>		4/14/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
102	SeaR_Molbogot_00871	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustiad <lraustiad@searay.com>			3/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
103	SeaR_Molbogot_00874	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Larry Raustiad <lraustiad@searay.com>	Dexter Howe <dexter.howe@searay.com>		3/22/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
104	SeaR_Molbogot_00885	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Dexter Howe <dexter.howe@searay.com> Larry Raustiad <lraustiad@searay.com> Scott Ward <scott.ward@brunswick.com>			4/20/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product	Communications with Sea Ray legal department discussing legal issues relating to the subject vessel in anticipation of litigation.
105	SeaR_Molbogot_00890	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/20/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
106	SeaR_Molbogot_00895	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/20/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
107	SeaR_Molbogot_00900	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>			4/21/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
108	SeaR_Molbogot_00901	Vargo, Jamie	Email	Jamie Vargo (Claims and Litigation Paralegal Brunswick Boat Group) <jamie.vargo@brunswick.com>	Brenda Shirer (Corporate Paralegal MarineMax) <brenda.shirer@marinemax.com>	Jennifer Davis <jennifer.davis@marinemax.com>		6/16/2020	Attorney-Client Privilege / Portion Redacted; Attorney Work Product; Common Interest - Joint Defense	Communications between legal Sea Ray and Marine Max legal departments advancing common interest and joint defense in anticipation of litigation.
109	SeaR_Molbogot_00907	N/A	pdf						Confidential and Proprietary Information / Portion Redacted	Confidential pricing information redacted