

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

RICHARD LOWERY

PLAINTIFF,

v.

LILLIAN MILLS, in her official capacity  
as Dean of the McCombs School of  
Business at the University of Texas at  
Austin; ETHAN BURRIS, in his official  
capacity as Senior Associate Dean for  
Academic Affairs of the McCombs School  
of Business at the University of Texas-  
Austin; and CLEMENS SIALM, in his  
official capacity as Finance Department  
Chair for the McCombs School of  
Business at the University of Texas-  
Austin,

DEFENDANTS.

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Case No. 1:23-CV-00129-EAY

**DEFENDANTS’ SECOND AMENDED PRIVILEGE LOG**

TO: Plaintiff Richard Lowery, by and through his attorneys of record, Endel Kolde, Institute for Free Speech, 1150 Connecticut Ave., NW, Suite 801, Washington, D.C. 20036.

Defendants Lillian Mills, in her official capacity as Dean of the McCombs School of Business at the University of Texas at Austin; Ethan Burris, in his official capacity as Senior Associate Dean for Academic Affairs of the McCombs School of Business at the University of Texas at Austin; and Clemens Sialm, in his official capacity as Finance Department Chair for the McCombs School of Business at the University of Texas at Austin (collectively, “Defendants”) serve their Second Amended Privilege Log upon Plaintiff Richard Lowery pursuant to Federal Rule of Civil Procedure 26(b)(5)(A).

Respectfully submitted,

JACKSON WALKER LLP

By: /s/ Joel R. Glover

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on February 15, 2024, I caused a copy of this privilege log to be served on counsel of record in compliance with the Federal Rules of Civil Procedure.

/s/ Joel R. Glover

Joel R. Glover

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
1.	PRIV-UT-LOWERY-000001	PRIV-UT-LOWERY-000001	11/8/21	• Richard Flores	• Jim Davis		Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client
2.	PRIV-UT-LOWERY-000002	PRIV-UT-LOWERY-000002	11/8/21	• Jim Davis	• Richard Flores	• Amanda Cochran-McCall	Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client
3.	PRIV-UT-LOWERY-000003	PRIV-UT-LOWERY-000004	11/8/21	• Richard Flores	• Jim Davis	• Amanda Cochran-McCall	Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
4.	PRIV-UT-LOWERY-000005	PRIV-UT-LOWERY-000006	11/8/21	<ul style="list-style-type: none"> <li>Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>Jim Davis</li> <li>Richard Flores</li> </ul>		Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client
5.	PRIV-UT-LOWERY-000007	PRIV-UT-LOWERY-000008	11/8/21	<ul style="list-style-type: none"> <li>Richard Flores</li> </ul>	<ul style="list-style-type: none"> <li>Jim Davis</li> <li>Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>Cynthia M. Sanchez</li> </ul>	Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client
6.	PRIV-UT-LOWERY-000009	PRIV-UT-LOWERY-000011	11/8/21	<ul style="list-style-type: none"> <li>Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>Jim Davis</li> <li>Richard Flores</li> </ul>	<ul style="list-style-type: none"> <li>Cynthia M. Sanchez</li> <li>Dene Coles</li> </ul>	Email	Email with counsel containing legal advice related to confidential communications and the Texas public information law.	Attorney Client
7a.	PRIV-UT-LOWERY-000012	PRIV-UT-LOWERY-000013	8/5/22 10:58 am	<ul style="list-style-type: none"> <li>Jay Hartzell</li> </ul>	<ul style="list-style-type: none"> <li>Lillian Mills</li> <li>Amanda Cochran-McCall</li> <li>Nancy Brazzil</li> <li>Ethan Burris</li> </ul>		Text	Correspondence with counsel regarding media coverage of new institute and First Amendment issues.	Attorney Client

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
7b.	PRIV-UT-LOWERY-000012	PRIV-UT-LOWERY-000013	8/5/22 11:00am	<ul style="list-style-type: none"> <li>• Jay Hartzell</li> </ul>	<ul style="list-style-type: none"> <li>• Lillian Mills</li> <li>• Amanda Cochran-McCall</li> <li>• Nancy Brazzil</li> <li>• Ethan Burris</li> </ul>		Text	Correspondence with counsel regarding media coverage of new institute and First Amendment issues.	Attorney Client
7c.	PRIV-UT-LOWERY-000012	PRIV-UT-LOWERY-000013	8/5/22	<ul style="list-style-type: none"> <li>• Lillian Mills 11:03am</li> </ul>	<ul style="list-style-type: none"> <li>• Amanda Cochran-McCall</li> <li>• Nancy Brazzil</li> <li>• Ethan Burris</li> <li>• Jay Hartzell</li> </ul>		Text	Correspondence with counsel regarding media coverage of new institute and First Amendment issues.	Attorney Client
7d.	PRIV-UT-LOWERY-000012	PRIV-UT-LOWERY-000013	8/5/22	<ul style="list-style-type: none"> <li>• Jay Hartzell 11:57am</li> </ul>	<ul style="list-style-type: none"> <li>• Lillian Mills</li> <li>• Amanda Cochran-McCall</li> <li>• Nancy Brazzil</li> <li>• Ethan Burris</li> </ul>		Text	Correspondence with counsel regarding media coverage of new institute and First Amendment issues.	Attorney Client
8.	PRIV-UT-LOWERY-000014	PRIV-UT-LOWERY-000014	8/12/22	<ul style="list-style-type: none"> <li>• Mike Rosen</li> </ul>	<ul style="list-style-type: none"> <li>• Jay Hartzell</li> <li>• Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>• Scott A Rabenold</li> <li>• Emily Reagan</li> <li>• Jim Davis</li> <li>• Amanda Cochran-McCall</li> <li>• Andrea Sheridan</li> <li>• Nancy Brazzil</li> <li>• Monica Horvat</li> <li>• Ivy Oliver</li> </ul>	Email	Email with counsel regarding talking points with input from counsel for syllabus inquiries, including university policies on syllabus content.	Attorney Client

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
8a.	PRIV-UT-LOWERY-000015	PRIV-UT-LOWERY-000015	8/12/22	<ul style="list-style-type: none"> <li>• Mike Rosen</li> </ul>	<ul style="list-style-type: none"> <li>• Jay Hartzell</li> <li>• Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>• Scott A Rabenold</li> <li>• Emily Reagan</li> <li>• Jim Davis</li> <li>• Amanda Cochran-McCall</li> <li>• Andrea Sheridan</li> <li>• Nancy Brazzil</li> <li>• Monica Horvat</li> <li>• Ivy Oliver</li> </ul>	Document (Attachment)	Draft talking points including input from counsel related to syllabus inquiries, including university policies on syllabus content.	Attorney Client
9.	PRIV-UT-LOWERY-000016	PRIV-UT-LOWERY-000016	8/5/22 6:58am	<ul style="list-style-type: none"> <li>• Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>• Jamie Rainelli</li> </ul>		Email	Correspondence requesting legal advice from counsel related to First Amendment issues.	Attorney Client

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
10.	PRIV-UT-LOWERY-000017	PRIV-UT-LOWERY-000020	8/11/22	<ul style="list-style-type: none"> <li>• Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>• Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>• Ethan Burris</li> <li>• Brittany Sedillo</li> <li>• Adam A. Biggs</li> </ul>	Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client
11.	PRIV-UT-LOWERY-000021	PRIV-UT-LOWERY-000026	8/19/22	<ul style="list-style-type: none"> <li>• Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>• Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>• Ethan Burris</li> <li>• Brittany Sedillo</li> <li>• Ivy Oliver</li> <li>• Adam A. Biggs</li> </ul>	Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client

## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
12.	PRIV-UT-LOWERY-000027	PRIV-UT-LOWERY-000027	8/26/22	<ul style="list-style-type: none"> <li>• Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>• Lillian Mills</li> <li>• Ivy Oliver</li> </ul>	<ul style="list-style-type: none"> <li>• Ethan Burris</li> </ul>	Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client
13.	PRIV-UT-LOWERY-000028	PRIV-UT-LOWERY-000030	8/31/22	<ul style="list-style-type: none"> <li>• Ivy Oliver</li> </ul>	<ul style="list-style-type: none"> <li>• Amanda Cochran-McCall</li> <li>• Lillian Mills</li> </ul>		Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client



## DEFENDANTS' SECOND AMENDED PRIVILEGE LOG

No.	Begin Bates No.	End Bates No.	Date	From	To	CC	Type	Privilege Description	Privilege Designation
14	PRIV-UT-LOWERY-000031	PRIV-UT-LOWERY-000035	8/11/22	<ul style="list-style-type: none"> <li>Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>Ethan Burris</li> <li>Brittany Sedillo</li> <li>Adam Biggs</li> </ul>	Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client
15	PRIV-UT-LOWERY-000036	PRIV-UT-LOWERY-000038	8/12/22	<ul style="list-style-type: none"> <li>Amanda Cochran-McCall</li> </ul>	<ul style="list-style-type: none"> <li>Lillian Mills</li> </ul>	<ul style="list-style-type: none"> <li>Ethan Burris</li> <li>Ivy Oliver</li> </ul>	Email	Correspondence with counsel regarding First Amendment issues.	Attorney Client

**DEFENDANTS' SECOND AMENDED PRIVILEGE LOG**

**Key**

1. Amanda Cochran-McCall  
(Vice President for Legal Affairs and General Counsel;  
Previously Deputy Vice President for Legal Affairs)
2. Andrea Sheridan  
(Deputy to the President for Governmental Affairs and  
Initiatives)
3. Emily Reagan  
(Vice President, Chief Marketing and Communications  
Manager)
4. Ivy Oliver  
(Former Chief Marketing and Communications Officer,  
McCombs School of Business)
5. Jay Hartzell  
(President of the University of Texas at Austin)
6. Jeff Graves  
(Chief Compliance Officer)
7. Jim Davis  
(Senior Vice President and Chief Operating Officer;  
Previously Vice President for Legal Affairs)
8. Lillian Mills  
(Dean of McCombs School of Business)
9. Mike Rosen  
(Assistant Vice President for University Communications)
10. Monica Horvat  
(Financial Officer, Budget Office; Previously Director of  
Presidential Priorities, Office of the President)
11. Nancy Brazzil  
(Deputy to the President)
12. Richard Flores  
(Deputy to the President for Academic Strategies)
13. Scott A Rabenold  
(Former Vice President for University Development)
14. Cynthia M. Sanchez  
(Administrative Program Coordinator and Executive  
Associate, Office of the President)
15. Dene Coles  
(Executive Assistant, Office of the Vice President for  
Business Strategies, Previously Office of the Vice  
President for Legal Affairs)