Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

### Law Firm:

Law Firm Name:Blake & BaronStreet Address:121 SW Main, Suite 1220City, State, Zip:Portland, OR 97201Phone Number:(503) 233-2515Website:www.blakebaron.comFile Number:1655Case Name:Jim BrownCase Number:001Lawyer Name:Bill BlakeLawyer Email:bill@blakebaron.comKawyer Phone:(503) 233-2515

## **Client:**

Client Name: Jim Brown Street Address: 3454 SW Washington City, State, Zip: Portland, OR 97259 Phone Number: (503) 776-6565 Email Address: jibrown@gmail.com Website:

# **Electronic Discovery Expert:**

E-Discovery Expert: Tom Howe

Law Firm: Howe & Associates Street Address: 333 State Street, Suite V421 City, State, Zip: Lake Oswego, OR 97034 Phone Number: (503) 227-6660 Email Address: Howe@HoweLawFirm.com Website: www.HoweLawFirm.com

## **Device Information:**

Device Name:DevicePhone Number:(503) 659-3223Manufacture:Apple Inc.Device Type:iPhone 5 (GSM)Model:MD640Kone 5 (GSM)Serial Number:Serial Number:F2LJLWDGDTTQSoftware Version:7.1.2Software Build:11D257UDID:2358d0f5540e23639bb0e663a8c7f76f785eb59dBluetooth MAC:64:a3:cb:36:95:e0Wifi MAC:64:a3:cb:36:95:df

## **Evidence Collection Information:**

 Collection Date:
 September 28, 2014 at 6:32:09 AM PDT

 Acquisition Hash:
 b00711c953fd2e1dc2c791a5d31ba4f156a1ea68

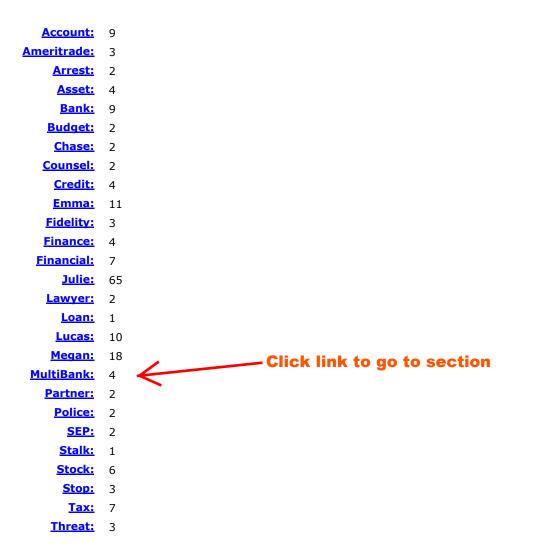
 Acquisition Size:
 16.6 GB for 8579 files

 Report Created:
 10/05/2014 11:03:57 PM

## **Device Email Accounts:**

jbrown@gmail.com jimbrown@hotmail.com

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)



Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Account (9)

### **Internet History**

Websites visited on the smartphone or computer. For example, husband frequently visited an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flag	jed Date and Time	Visits	Title
	08/02/2014 08:24:07 PDT	2	Credit Account Summary - Macy's Credit Card - Macy's Click link to open document
	08/02/2014 08:24:07 PDT	2	<u>Credit <mark>Account</mark> Summary - Macy's Credit Card - Macy's</u>

#### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	g Imessage	09/18/2014 18:08:59 PDT	MultiBank	(800) 587-5533	Account terms have changed. Login to your account to view.

### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Set up new account at Ameritrade and transfer
---

### **Skype Messages**

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant). HTMLTEXT

Time: 08/28/2014 08:09:03 PDT To/From: --User/Number: --Account: jimbrown Body: OK, I will work on that now.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Account (9)

### **Skype Messages**

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant). HTMLTEXT

Time: 07/27/2014 12:31:15 PDT To/From: --User/Number: --Account: iimbrown Body: I was about to take a break. If I am gone 30 min is that ok? I was about to take a break. Time: 03/07/2014 06:19:16 PST To/From: --User/Number: --Account: jimbrown Body: I hope you have

#### Voice Memos

had a good week

Voice memos on the smartphone or computer. Review voice memos for evidence relevant to the issues in your case.

Flagged	Date and Time	Duration	Listen	Source
	9/17/2014 10:05 PST	00:00:10	VoiceMemo- RemoveJulieFromCreditCardAccounts.mp3	/private/var/mobile/Media/Media/Recordings/VoiceMemo- RemoveJulieFromCreditCardAccounts.mp3
				Click link to listen to voicemail

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Ameritrade (3)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

Flagged Date and Time	Duration Calendar	Summary / Description / Location	
3/27/2014 11:00:00	) PST 1 day Calendar	Ameritrade - Transfer money	

### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Set up new account at Ameritrade and transfer money

### **Phone Calls**

Phone calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

F	lagged	Туре	Date and Time	To/From	Number	Duration
		Outgoing	07/30/2014 17:15:17 PDT	Ameritrade	(800) 454-9272	00:32:00

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Arrest (2)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	g Imessage	09/06/2014 18:08:59 PDT	Julie Brown	(503) 701-5688	I need to call your brother for some legal advice about that misdeamor arrest for leaving Emma in the car alone when I went shopping. This is B.S. I was only gone 20 minutes while she was sleeping
Voice	Mail								

Voicemails on the smartphone or computer. In the famous Alec Baldwin custody case, Alec left and outrageous and insensitive voicemail for his 13 year old daughter that was used against him.

I	Flagged	Unread	Date and Time	From	Number	Duration	Deleted Date	Listen
		Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieArrestedEmmaLeftInCar.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Asset (4)

## **Internet History**

Websites visited on the smartphone or computer. For example, husband frequently visited an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

I	-lagged	Date and Time	Visits	Title
		05/29/2014 01:03:43 PDT	8	Divorce Hiding Assets
		05/4/2014 01:03:43 PDT	4	<u>10 Easy Ways to Hide Assets From Your Spouse</u>
		05/29/2014 01:03:43 PDT	8	Divorce Hiding Assets
		05/4/2014 01:03:43 PDT	4	<u>10 Easy Ways to Hide Assets From Your Spouse</u>

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

## Search Term: Bank (9)

#### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

	Full Name Work Mobile	Bank of America (866) 758-5934
	Homepage Work Note	400 4th StreetLake Oswego OR 97034
	Created Modified	06/13/2014 17:33:43 PDT 06/13/2014 17:33:43 PDT
	Full Name Work Note Created Modified	Citibank       AAdvantage         (503)       228-6533         06/13/2014       17:34:04 PDT         06/13/2014       17:34:04 PDT
_		

#### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged	Title	Web Address
	Bank of America	https://www.bankofamerica.com/
	Multibank Offshore Bank	https://www.multibank.com.pa/en/default.html
	Bank of America	https://www.bankofamerica.com/
	Multibank Offshore Bank	https://www.multibank.com.pa/en/default.html

#### **Internet History**

Websites visited on the smartphone or computer. For example, husband frequently visited an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged Date and Time Visits

08/02/2014 08:14:43 PDT 2 Wells Fargo Bank Rewards

Title

#### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	g Imessage	09/18/2014 18:08:59 PDT	MultiBank	(800) 587-5533	Account terms have changed. Login to your account to view.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Bank (9)

## **Phone Calls**

Phone calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

Flagged	Туре	Date and Time	To/From	Number	Duration
	Missed	07/28/2014 11:57:47 PDT	MultiBank	(800) 547-2653	00:20:34

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Budget (2)

### **Documents**

Documents on the smartphone or computer. Documents are often important in property division and business valuation cases (e.g. spreadsheets, bank statements, tax returns, loans, and information revealing hidden assets). Click on the hyperlink to open the ACTUAL document file to review or use as evidence in court.

Flagged Match	Date and Time	File	Kind
	07/15/2011 13:19 PDT	GenHealth Monthly Budget.xlsx	Excel
	04/23/2010 20:19 PDT	GenHealth Yearly Budget.xlsx	Excel

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Chase (2)

### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged	Title	Web Address
	Chase Visa Notary	(http://www.chase.com/
	Chase Visa Notary	http://www.chase.com/

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Counsel (2)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

Flagged	Date and Time	Duration Calendar	Summary / Description / Location
	06/18/2014 17:45:00 PDT	1.0 hour Calendar	Counselor Appointment

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Take Lucas to counselor he has night terror dreams

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Credit (4)

### **Internet History**

Websites visited on the smartphone or computer. For example, husband frequently visited an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged	Date and Time	Visits	Title
	08/02/2014 08:24:07 PDT	2	Credit Account Summary - Macy's Credit Card - Macy's
Notes			

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Good time to increase line of credit because busines revenue is good.

#### **Voice Memos**

Voice memos on the smartphone or computer. Review voice memos for evidence relevant to the issues in your case.

I	Flagged	Date and Time	Duration	Listen	Source
		9/17/2014 10:05 PST	00:00:10	VoiceMemo- RemoveJulieFromCreditCardAccounts.mp3	/private/var/mobile/Media/Media/Recordings/VoiceMemo- RemoveJulieFrom <mark>Credit</mark> CardAccounts.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Emma (11)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

Flag	ged Date and Time	Duration	Calendar	Summary / Description / Location
	8/09/2014 16:00:00 PST	1 day	Birthdays	Emma Birthday

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged Deleted Attachment Unread	Unread Type	Date and Time	To/From	Number	Text
	Outgoing Imessage	09/07/2014 18:06:48 PDT	Julie Brown	(503) 701-5688	Emma says she isn't feeling well. Who is her doctor?
	Incoming Imessage	09/06/2014 18:08:59 PDT	Julie Brown	(503) 701-5688	I need to call your brother for some legal advice about that misdeamor arrest for leaving Emma in the car alone when I went shopping. This is B.S. I was only gone 20 minutes while she was sleeping

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

#### Does Emma have dyslexia?

Emma fell at school today and got 5 stiches. I picked her up at 11 AM.

Emma got most improved student award for the month.

## Skype Calls

ette an la la companya da la companya da la companya da companya da la companya da companya da companya da comp

#### Flagged

]	Incoming	07/24/2014 15:32 PDT	 	12	emmabrown
]	Incoming	07/16/2014 04:41 PDT	 	3	emmabrown

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Emma (11)

### Videos

Videos on the smartphone or computer. For example, video showed mental instability of spouse who had taken pills and threatened suicide. also, videos can show parents involved in activities with the kids.

File	Video-EmmaSwing.mp4
Thumbnail	thumbs/12499554.jpg
File Time	07/13/2014 13:20:50 PDT
Exif Time	2014-04-03T14:57:05Z
Source	private/var/mobile/Media/iTunes_Control/Music/F01/ZSBX.mp4

### Voice Mail

Voicemails on the smartphone or computer. In the famous Alec Baldwin custody case, Alec left and outrageous and insensitive voicemail for his 13 year old daughter that was used against him.

FI	lagged	Unread	Date and Time	From	Number	Duration	Deleted Date	Listen
		Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieArrestedEmmaLeftInCar.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Fidelity (3)

#### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

Full Name	Fidelity Stocks
Work	(800) 544-3645
Work	7493 SW Bridgeport RoadTigard OR 97224
Note	
Created	06/13/2014 17:34:28 PDT
Modified	06/13/2014 17:34:28 PDT

### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged	Title	Web Address
	401K Fidelity Investments	https://www.fidelity.com/
	401K Fidelity Investments	https://www.fidelity.com/

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Finance (4)

### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged Title	Web Address	
Stock - Amazon	http://www.google.com/finance?q=NASD	AQ%3AAMZN&ei=RvQqVPilEMHwiwLbmYCYDw
Stock - Apple Inc.	http://www.google.com/finance?q=apple	
Stock - Google Inc.	http://www.google.com/finance?q=NASD	AQ%3Agoog

### **Internet History**

Websites visited on the smartphone or computer. For example, husband frequently visited an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged Date and Time Visit	s Title
-----------------------------	---------

05/29/2014 01:03:43 PDT 8 <u>Divorce Hiding Assets</u>

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Financial (7)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

F	lagged	Date and Time	Duration	Calendar	Summary / Description / Location
		3/24/2014 11:00:00 PST	1 day	Calendar	Financial Advisor Meeting
		3/26/2014 10:00:00 PST	1.0 hour	Calendar	Financial Advisor Meeting

#### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

Full Name	David Little Financial Advisor
Other Created	(503) 543-5454 06/13/2014 17:33:15 PDT
Modified	06/13/2014 17:33:15 PDT

### **Documents**

Documents on the smartphone or computer. Documents are often important in property division and business valuation cases (e.g. spreadsheets, bank statements, tax returns, loans, and information revealing hidden assets). Click on the hyperlink to open the ACTUAL document file to review or use as evidence in court.

Flagged Match	Date and Time	File	Kind
	09/21/2013 15:11 PDT	Financial History and Net Worth.xlsx	Excel
	02/26/2013 21:56 PST	(Financial Summary.xlsx)	Excel
	07/15/2011 13:19 PDT	GenHealth Financial_Statements.pdf	PDF

#### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	J Imessage	09/16/2014 19:01:36 PDT	Julie Brown	(503) 701-5688	Personally, I am no threat to you <mark>financially,</mark> as our lawyers will decide what is equitable Have a good night and week.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Julie (65)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged Deleted	d Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
			Incoming	J Imessage	09/16/2014 19:26:42 PDT	<mark>Julie</mark> Brown	(503) 701-5688	That agreement was one sided. Time for both sides. Good night.
			Incoming	J Imessage	09/16/2014 19:01:36 PDT	<mark>Julie</mark> Brown	(503) 701-5688	Personally, I am no threat to you financially, as our lawyers will decide what is equitable Have a good night and week.
			Outgoing	Imessage	09/16/2014 18:08:59 PDT	<mark>Julie</mark> Brown	(503) 701-5688	It frightens me
			Outgoing	Imessage	09/15/2014 18:08:59 PDT	<mark>Julie</mark> Brown	(503) 701-5688	I drove by your house last night and saw Frank's car. You really piss me off! I need to smack some sense into you.
			Incoming	j Imessage	09/15/2014 18:00:59 PDT	<mark>Julie</mark> Brown	(503) 701-5688	Frank is my friend. He supports me, and has never hit me (unlike you).
			Incoming	g Imessage	09/10/2014 18:25:04 PDT	<mark>Julie</mark> ) Brown	(503) 701-5688	In order to not have this issue again, may I send you my availability to see the kids in the future so we might have some comparable time with them?
			Outgoing	Imessage	09/10/2014 18:21:41 PDT	<mark>Julie</mark> Brown	(503) 701-5688	I'm aware of that. So stop threatening me that you've noted I've denied access when there were no plans
			Incoming	J Imessage	09/07/2014 18:22:19 PDT	Julie Brown	(503) 701-5688	You have a strange definition of threat?
			Incoming	J Imessage	09/07/2014 18:09:46 PDT	<mark>Julie</mark> Brown	(503) 701-5688	You are in control of their lives right now So may I see them
			Incoming	g Imessage	09/07/2014 18:08:59 PDT	<mark>Julie</mark> Brown	(503) 701-5688	Sorry that you couldn't make it to Lucas' game last night. Would you like to take them to the movies tomorrow afternoon?
			Outgoing	Imessage	09/07/2014 18:06:48 PDT	<mark>Julie</mark> Brown	(503) 701-5688	Clearly you are trying to test me, which is why I cannot trust you. This is not about the kids
			Outgoing	Imessage	09/07/2014 18:06:48 PDT	<mark>Julie</mark> Brown	(503) 701-5688	Emma says she isn't feeling well. Who is her doctor?
			Incoming	J Imessage	09/06/2014 18:08:59 PDT	Julie Brown	(503) 701-5688	I need to call your brother for some legal advice about that misdeamor arrest for leaving Emma in the car alone when I went shopping. This is B.S. I was only gone 20 minutes while she was sleeping

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Julie (65)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread		Туре	Date and Time	To/From	Number	Text
				Incoming	Imessage	08/28/2014 18:05:40 PD	T <mark>Julie</mark> Brown	(503) 701-5688	Ok. Noted that you deny acess tonight. Thanks
				Incoming	Imessage	08/25/2014 18:08:59 PD	T <mark>Julie</mark> Brown	(503) 701-5688	I know you are pissed off about the police coming out last night. I told them you pushed me and now you are in deep shit. I can make up all kids of shit and ruin your life if you don't give me the settlement I want.
				Outgoing	Imessage	08/20/2014 18:05:13 PD	T <mark>Julie</mark> Brown	(503) 701-5688	I have a feeling you're up to something so I'm not sure I trust being around you
				Incoming	Imessage	08/15/2014 19:46:24 PD	T <mark>Julie</mark> ) Brown	(503) 701-5688	Seriously, Julie. I wish you the best. I do not waste my time worrying about your personal life anymore. My only concern is when the kids are involved Again, have a good night and please let me know when I can pick up tomorrow. Thank you.
				Incoming	Imessage	08/10/2014 19:29:20 PD	T <mark>Julie</mark> Brown	(503) 701-5688	I had someone in my bed until 8am that morning.
				Outgoing	Imessage	08/10/2014 19:25:48 PD	T <mark>Julie</mark> Brown	(503) 701-5688	Are you going to stop stalking my house in the morning? My mom saw you
				Incoming	Imessage	08/10/2014 18:08:59 PD	T <mark>Julie</mark> Brown	(503) 701-5688	I know you are hiding money from me. Come clean and be fair.
				Incoming	Imessage	08/10/2014 18:05:09 PD	T <mark>Julie</mark> Brown	(503) 701-5688	My personal/work life is none of your business anymore.
				Outgoing	Imessage	08/10/2014 18:00:59 PD	T <mark>Julie</mark> Brown	(503) 701-5688	You can't prove anything!
				Outgoing	Imessage	08/08/2014 18:08:25 PD	T <mark>Julie</mark> Brown	(503) 701-5688	FaceTime is a form of access
				Incoming	Imessage	08/06/2014 18:08:59 PD	T <mark>Julie</mark> Brown	(503) 701-5688	I will leave work early today to pick up the kids so you can have a break today.
				Incoming	Imessage	08/15/2014 19:46:24 PD	T <mark>Julie</mark> Brown	(503) 701-5688	Seriously, Julie. I wish you the best. I do not waste my time worrying about your personal life anymore. My only concern is when the kids are involved Again, have a good night and please let me know when I can

have a good night and please let me know when I can pick up tomorrow. Thank you.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Julie (65)

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Julie was let go from her job. Constant tardiness.

Julie does not attend parent-teacher conferences or other school events.

Is Julie moving out of state?

Julie slapped in front of the kids today. I was picking up the kids at her apartment and she started yelling at me, and hit me.

Julie forgot to pick up the kids at school today (again)

Julie's car broke down and now she cannot pickup the kids on Wednesdays. I will see if my Mom can do it.

Julie out of town for two weeks looking for work in Reno.

Julie needs Anger Management class. Yells at kids too much. Kids are afraid of her.

Tell lawyer, 3 years ago, after Julie's motorcycle accident, she was in the hospital for 2 days.

#### **Phone Calls**

Phone calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

Flagged	Туре	Date and Time	To/From	Number	Duration
	Outgoing	07/30/2014 13:20:09 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:48
	Outgoing	07/30/2014 13:19:26 PDT	Julie Brown	(503) 901-5886	00:00:17
	Missed	07/29/2014 17:56:11 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:32
	Missed	07/29/2014 16:43:43 PDT	Julie Brown	(503) 901-5886	00:04:03
	Missed	07/29/2014 16:24:13 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:03:11

### Skype Calls

### Flagged

Incoming	07/07/2014 10:06 PDT	 	4	(juliebrown)
Incoming	04/06/2014 11:49 PDT	 	54	juliebrown
Incoming	04/05/2014 11:55 PDT	 	7	juliebrown

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Julie (65)

## Voice Mail

Voicemails on the smartphone or computer. In the famous Alec Baldwin custody case, Alec left and outrageous and insensitive voicemail for his 13 year old daughter that was used against him.

Flagged	Unread	Date and Time	From	Number	Duration	Deleted Date	Listen
	Trash	09/22/2014 11:41:36 PDT	Julie Brown	(503) 901-5886	00:04:00	09/22/2014	VM-JuileWillYouPickUpKidsHappyHour.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieArrestedEmmaLeftInCar.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieFrickingControllingGetWhatYouDeserve.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieJimCallMeRightAway.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieMissLucasGameAwesomeCoach.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieMovedOutofHouseToday.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JuliePushingCustodyDumbAss.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieSorryBreakdownGreatDad.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieTiredTakingCareKidsYouReap.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-Pocket Dial.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieArrestedEmmaLeftInCar.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieFrickingControllingGetWhatYouDeserve.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieJimCallMeRightAway.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieMissLucasGameAwesomeCoach.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieMovedOutofHouseToday.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JuliePushingCustodyDumbAss.mp3
	Trash	09/05/2014 15:59:27 PDT	<mark>Julie</mark> Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieSorryBreakdownGreatDad.mp3
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieTiredTakingCareKidsYouReap.mp3
	Trash	09/05/2014 15:59:27 PDT	Paul Martin	(503) 276-4139	00:00:24	09/05/2014	VM-NeighborPaulJulieWildPartyPolice.mp3

#### **Voice Memos**

Voice memos on the smartphone or computer. Review voice memos for evidence relevant to the issues in your case.

9/1/2014 10:05 PST       00:00:11       VoiceMemo-GetJulieJobAtSafeway.mp3       /private/var/mobile/Media/Media/Recordings/VoiceMemo-GetJulieJobAtSafeway.mp3         9/17/2014 10:05 PST       00:00:10       VoiceMemo- RemoveJulieFromCreditCardAccounts mp3       /private/var/mobile/Media/Media/Recordings/VoiceMemo- Private/var/mobile/Media/Media/Recordings/VoiceMemo- RemoveJulieFromCreditCardAccounts mp3	Flagged	Date and Time	Duration	Listen	Source
		9/1/2014 10:05 PST	00:00:11	VoiceMemo-GetJulieJobAtSafeway.mp3	/private/var/mobile/Media/Media/Recordings/VoiceMemo-GetJulieJobAtSafeway.mp3
<b>Removeduler on created at a contract of the c</b>		9/17/2014 10:05 PST	00:00:10	VoiceMemo- RemoveJulieFromCreditCardAccounts.mp3	/private/var/mobile/Media/Media/Recordings/VoiceMemo- RemoveJulieFromCreditCardAccounts.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Lawyer (2)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	J Imessage	09/16/2014 19:01:36 PDT	Julie Brown	(503) 701-5688	Personally, I am no threat to you financially, as our lawyers will decide what is equitable Have a good night and week.

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Tell lawyer, 3 years ago, after Julie's motorcycle accident, she was in the hospital for 2 days.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Loan (1)

### **Documents**

Documents on the smartphone or computer. Documents are often important in property division and business valuation cases (e.g. spreadsheets, bank statements, tax returns, loans, and information revealing hidden assets). Click on the hyperlink to open the ACTUAL document file to review or use as evidence in court.

Flagged Match	Date and Time	File	Kind
	09/02/2014 17:49 PDT	Loan Estimate.pdf	PDF

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Lucas (10)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

Flagged	Date and Time	Duration	Calendar	Summary / Description / Location
	7/01/2014 16:00:00 PST	1 day	Birthdays	Lucas Birthday
	04/14/2014 17:00:00 PDT	1 day	Calendar	School - Lucas Band Concerts

#### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	g Imessage	09/07/2014 18:08:59 PDT	Julie Brown	(503) 701-5688	Sorry that you couldn't make it to <b>Lucas'</b> game last night. Would you like to take them to the movies tomorrow afternoon?

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Lucas needs an eye exam and glasses
Take Lucas to counselor he has night terror dreams
Buy <mark>Lucas</mark> a new bed.
Lucas needs an eye exam and glasses

### Videos

Videos on the smartphone or computer. For example, video showed mental instability of spouse who had taken pills and threatened suicide. also, videos can show parents involved in activities with the kids.

 File
 Video-LucasSwing.mp4

 Thumbnail
 thumbs/12500211.jpg

 File Time
 11/19/2013 23:07:10 PST

 Exif Time
 2013-10-30T15:16:19Z

 Source
 private/var/mobile/Media/iTunes\_Control/Music/F28/WQWO.mp4

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Lucas (10)

### Voice Mail

Voicemails on the smartphone or computer. In the famous Alec Baldwin custody case, Alec left and outrageous and insensitive voicemail for his 13 year old daughter that was used against him.

Flagged	Unread	Date and Time	From	Number	Duration	Deleted Date	Listen
	Trash	09/05/2014 15:59:27 PDT	Julie Brown	(503) 901-5886	00:00:24	09/05/2014	VM-JulieMissLucasGameAwesomeCoach.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Megan (18)

#### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

Full Name Work Work	Megan Jackson, Girlfriend (503) 548-5844
Note Created Modified	06/13/2014 17:33:24 PDT 06/13/2014 17:33:25 PDT

### **Phone Calls**

Phone calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

Flagged	Туре	Date and Time	To/From	Number	Duration
	Missed	08/04/2014 11:28:58 PDT	Megan Jackson	(503) 548-9696	00:43:00
	Missed	08/03/2014 14:14:25 PDT	Megan Jackson	(503) 548-9696	00:21:00
	Incoming	08/03/2014 14:09:25 PDT	Megan Jackson	(503) 548-9696	00:00:36
	Outgoing	08/03/2014 14:07:33 PDT	<mark>Megan</mark> Jackson	(503) 548-9696	00:05:02
	Missed	08/02/2014 20:06:04 PDT	Megan Jackson	(503) 548-9696	00:41:00
	Incoming	08/02/2014 17:41:18 PDT	Megan Jackson	(503) 548-9696	00:01:30
	Missed	07/31/2014 15:49:26 PDT	Megan Jackson	(503) 548-9696	00:14:00
	Missed	07/31/2014 09:15:02 PDT	<mark>Megan</mark> Jackson	(503) 548-9696	00:11:00
	Missed	07/31/2014 08:39:54 PDT	Megan Jackson	(503) 548-9696	00:09:00
	Incoming	07/30/2014 17:15:34 PDT	Megan Jackson	(503) 548-9696	00:00:42
	Outgoing	07/30/2014 17:15:28 PDT	Megan Jackson	(503) 548-9696	00:00:05
	Outgoing	07/30/2014 17:14:27 PDT	Megan Jackson	(503) 548-9696	00:00:17
	Missed	07/29/2014 18:23:53 PDT	Megan Jackson	(503) 548-9696	00:04:00
	Missed	07/29/2014 13:01:30 PDT	Megan Jackson	(503) 548-9696	00:14:00

### **Skype Calls**

Skype calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

Flagged

Incoming	04/05/2014 11:54 PDT	 	2	meganjackson
Incoming	04/05/2014 11:54 PDT	 	12	meganjackson
Incoming	04/05/2014 11:54 PDT	 	8	meganjackson

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: MultiBank (4)

### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Flagged	Title	Web Address
	Multibank Offshore Bank	https://www.multibank.com.pa/en/default.html
	Multibank Offshore Bank	https://www.multibank.com.pa/en/default.html

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Incoming	g Imessage	09/18/2014 18:08:59 PDT	MultiBank	(800) 587-5533	Account terms have changed. Login to your account to view.

## **Phone Calls**

Phone calls on the smartphone or computer. Review date and time of calls, who made and received the call, and the length of the call. For example: wife used this evidence to obtain a restraining order because of a harassing spouse.

Flagged Ty	уре	Date and Time	To/From	Number	Duration
М	lissed	07/28/2014 11:57:47 PDT	MultiBank	(800) 547-2653	00:20:34

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Partner (2)

### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

Debra Mars,
Business <mark>Partner</mark>
(503) 676-5455
(503) 787-4578
Portland OR
06/13/2014 17:35:10 PDT
06/13/2014 17:35:10 PDT

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

Buy out business partner?

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Police (2)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Fla	agged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
v	oice	Mail			Incoming	Imessage	08/25/2014 18:08:59 PDT	Julie Brown	(503) 701-5688	I know you are pissed off about the police coming out last night. I told them you pushed me and now you are in deep shit. I can make up all kids of shit and ruin your life if you don't give me the settlement I want.

#### voice maii

Voicemails on the smartphone or computer. In the famous Alec Baldwin custody case, Alec left and outrageous and insensitive voicemail for his 13 year old daughter that was used against him.

FI	agged	Unread	Date and Time	From	Number	Duration	Deleted Date	Listen
		Trash	09/05/2014 15:59:27 PDT	Paul Martin	(503) 276-4139	00:00:24	09/05/2014	VM-NeighborPaulJulieWildPartyPolice.mp3

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: SEP (2)

## Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

F	lagged	Date and Time	Duration	Calendar	Summary / Description / Location
		12/31/2013 16:00:00 PST	1 day	Calendar	Yearly: Withdraw Money from SEP; Pay HSA
		04/14/2014 17:00:00 PDT	1 day	Calendar	Yearly: IRA and SEP

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Stalk (1)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged	Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Outgoing	Imessage	08/10/2014 19:25:48 PDT	Julie Brown	(503) 701-5688	Are you going to stop <mark>stalking</mark> my house in the morning? My mom saw you

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Stock (6)

#### Contacts

Contacts on the smartphone or computer. Review Contacts to find potential witnesses (for and against) your client's interest. For example: teachers, coaches, CPAs, doctors, and therapists.

Full Name	Fidelity <mark>Stocks</mark>
Work	(800) 544-3645
Work	7493 SW Bridgeport RoadTigard OR 97224
Note	
Created	06/13/2014 17:34:28 PDT
Modified	06/13/2014 17:34:28 PDT

#### **Documents**

Flagged Title

Documents on the smartphone or computer. Documents are often important in property division and business valuation cases (e.g. spreadsheets, bank statements, tax returns, loans, and information revealing hidden assets). Click on the hyperlink to open the ACTUAL document file to review or use as evidence in court.

Flagged Match	Date and Time	File	Kind
	07/30/2014 08:32 PDT	Stock Certificate Allied Paper.jpg	JPG

#### **Internet Bookmarks**

Bookmarks on the smartphone or computer. For example, husband bookmarked an offshore bank website where he had hidden marital assets. Click on the hyperlink to open the website.

Morningstar Stock Investment Research	http://www.morningstar.com/
Stock - Amazon	http://www.google.com/finance?q=NASDAQ%3AAMZN&ei=RvQqVPilEMHwiwLbmYCYDw
Stock - Apple Inc.	http://www.google.com/finance?q=apple
<mark>Stock</mark> - Google Inc.	http://www.google.com/finance?q=NASDAQ%3Agoog

Web Address

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Stop (3)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagg	ed Deleted	Attachment	Unread	Unread	Туре	Date and Time	To/From	Number	Text
				Outgoing	g Imessage	09/10/2014 18:21:41 PDT	Julie Brown	(503) 701-5688	I'm aware of that. So stop threatening me that you've noted I've denied access when there were no plans
				Outgoing	J Imessage	08/10/2014 19:25:48 PDT	Julie Brown	(503) 701-5688	Are you going to stop stalking my house in the morning? My mom saw you

#### Notes

Notes on the smartphone or computer. Review notes for evidence relevant to the issues in your case.

AA Meeting - can't stop drinking. Share about Friday night.

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Tax (7)

### Calendar

Calendar items and events on the smartphone or computer. This can be helpful to prove which parent spent significant time with the child (e.g. school and sports events, pediatrician appointments).

Flagged	Date and Time	Duration	Calendar	Summary / Description / Location
	10/01/2013 08:00:00 PDT	00:30	Calendar	Clackamas Property Tax Due
	11/14/2013 16:00:00 PST	1 day	Calendar	Real Property Taxes (11/15) (Yearly)
	01/14/2014 16:00:00 PST	1 day	Calendar	Estimated Taxes Due (1/15) (Every Year)
	04/14/2014 17:00:00 PDT	1 day	Calendar	Estimated Taxes Due (4/15) (Every Year)
	06/14/2014 17:00:00 PDT	1 day	Calendar	Estimated Taxes Due (6/15) (Every Year)
	09/14/2014 17:00:00 PDT	1 day	Calendar	Estimated Taxes Due (9/15) (Every Year)

### **Documents**

Documents on the smartphone or computer. Documents are often important in property division and business valuation cases (e.g. spreadsheets, bank statements, tax returns, loans, and information revealing hidden assets). Click on the hyperlink to open the ACTUAL document file to review or use as evidence in court.

 Flagged
 Match
 Date and Time
 File

 06/12/2014 15:45 PDT
 Property Tax Statement.pdf
 PDF

Electronic Discovery Report (Privileged and Confidential: Attorney-Work-Product)

# Search Term: Threat (3)

### Messages

Text messages on the smartphone or computer sorted by date. Text messages are often the most important type of evidence relating to custody or visitation. Review information by certain people, certain dates, or search for relevant keywords. Text messages not only reveal specific facts but also can reveal the mental state or disposition of a spouse at a particular time (when they are not thinking like a litigant).

Flagged Deleted Attachment	Unread Unread	Туре	Date and Time	To/From	Number	Text
	Incomir	ng Imessage	09/16/2014 19:01:36 PDT	Julie Brown	(503) 701-5688	Personally, I am no threat to you financially, as our lawyers will decide what is equitable Have a good night and week.
	Outgoir	ig Imessage	09/10/2014 18:21:41 PDT	Julie Brown	(503) 701-5688	I'm aware of that. So stop threatening me that you've noted I've denied access when there were no plans
	Incomir	ng Imessage	09/07/2014 18:22:19 PDT	Julie Brown	(503) 701-5688	You have a strange definition of threat?