

**IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION**

MEIBEL SABOYA DIAZ,

Plaintiff,

vs.

CASE NO.: 2023-CA-000499

**SEAWORLD PARKS &
ENTERTAINMENT LLC, D/B/A
BUSCH GARDENS,**

DIVISION: E

Defendant.

**DEFENDANT SEAWORLD PARKS & ENTERTAINMENT LLC'S
PRIVILEGE LOG**

Defendant SeaWorld Parks & Entertainment LLC (“SeaWorld”) hereby serves its Privilege Log regarding material withheld from SeaWorld’s Responses to Plaintiff’s First Request for Production:

RESPONSE NO.	PRIVILEGE ASSERTED	BASIS OF PRIVILEGE	DESCRIPTION OF PRIVILEGED ITEM
Request No. 4	Work product doctrine	Accident Investigation Report prepared in anticipation of litigation	Accident Investigation Report prepared in anticipation of litigation by Busch Gardens employee Sarah Hannah on November 2, 2019
Request No. 15	Attorney client privilege and work product doctrine	Communication between attorney and client and communication regarding work product investigation conducted in anticipation of litigation	ESIS claim file regarding the subject alleged accident and work product investigation conducted in anticipation of litigation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Privilege Log has been furnished to Amy K. Kenyon, Esq., Kenyon Law Group, P.L.L.C., 1215 Manatee Avenue West, Suite 105, Bradenton, FL 34205 via e-mail to eservice@kenyonlawfirm.com (Attorneys for Plaintiff), this 23rd day of May, 2023.

s/ Carie L. Hall

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