

August 24, 2016

PE16-008
PRIVILEGE LOG

Appendix I

Item No.	Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
1	PE16-008 001034 ER - PE16-008 001038 ER	Email	Michael O'Reilly, Ford's Office of the General Counsel Attorney	Lokesh Setti, Ford Employee; John Risch, Ford Employee; Mark Tuneff, Ford Employee	Jessica Zacharski, Ford's Office of the General Counsel Attorney	5/11/2015	E-mail correspondence between Attorney in Ford's Office of the General Counsel and Ford Employees regarding legal advice and mental impressions related to carbon monoxide testers and legal inspection. Produced in redacted form.	Attorney Client Privilege
2	PE16-008 001039 ER - PE16-008 001043 ER	Email with Attachment	(1) Lokesh Setti, Ford Employee; (2) Mark Tuneff, Ford Employee	(1) Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Mark Tuneff, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney; (2) Lokesh Setti, Ford Employee; Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney	(1) Bharat Patel, Ford Employee; (2) Bharat Patel, Ford Employee	(1) 3/2/15; (2) 3/2/15	E-mail correspondence with attachment between Ford Employees and Attorneys and legal assistant in Ford's Office of the General Counsel reflecting legal advice and direction provided by Ford's Office of the General Counsel re 2011-2013 Explorer exhaust CO allegations and legal proceedings. Produced in redacted form.	Attorney Client Privilege Attorney Work Product

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3	PE16-008 001044 ER - PE16-008 001046 ER	Email with Attachment	Michael O'Reilly, Ford's Office of the General Counsel Attorney	Lokesh Setti, Ford Employee; John Risch, Ford Employee; Mark Tuneff, Ford Employee	Michael O'Reilly, Ford's Office of the General Counsel Attorney;	8/6/2015;	E-mail correspondence between Attorney in Ford's Office of the General Counsel and Ford Employees regarding legal advice sought regarding customer request. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
4	PE16-008 001047 ER - PE16-008 00148 ER	Email	Kevin Ricks, Ford Employee	Bob Case, Ford Employee; Timothy Schaffer, Ford Employee; Kevin Krawczyk, Ford Employee		7/18/2014	E-mail correspondence between Ford Employees reflecting legal advice received from Attorney in Ford's Office of the General Counsel regarding TSB. Produced in redacted form.	Attorney Client Privilege
5	PE16-008 001049 ER - PE16-008 001051 ER	Email	(1) Emily Frascaroli, Ford's Office of the General Counsel Attorney; (2) Emily Frascaroli, Ford's Office of the General Counsel Attorney; (3) Kris Christensen, Ford Employee	(1) Michael Tokarski, Ford Employee; Paul Larkins, Ford Employee; John Shanahan, Ford Employee; Greg Gardner, Ford Employee; James Centlivre, Ford Employee; Lawrence Kummer, Ford Employee; David Mangham, Ford Employee; Fred Butler, Ford Employee; John Tatge, Ford Employee; Donna Bell, Ford Employee; Bob Case, Ford Employee; Kevin Ricks, Ford Employee; Ronald Martelli, Ford Employee; Caleb Xiangfu Wang, Ford Employee; (2) Kris Christensen, Ford Employee; (3) Bharat Patel, Ford Employee	(1) Todd Fronckowiak, Ford Employee; Rouaa Nakhleh, Ford Employee; Francis Wickenheiser, Ford Employee; David Ott, Ford Employee; Amanda Prescott, Ford Employee; (3) Emily Frascaroli, Ford's Office of the General Counsel Attorney	(1) 7/7/2014; (2) 7/7/2014; (3) 7/7/2014	E-mail correspondence between Attorney in Ford's Office of the General Counsel and Ford Employees reflecting legal advice regarding TSB. Produced in redacted form.	Attorney Client Privilege

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6	PE16-008 001052 ER - PE16-008 001056 ER	Email with Attachment	(1) Michael O'Reilly, Ford's Office of the General Counsel Attorney; (2) Mark Tuneff, Ford Employee; (3) Michael O'Reilly, Ford's Office of the General Counsel Attorney	(1) John Risch, Ford Employee; Mark Tuneff, Ford Employee; (2) Michael O'Reilly, Ford's Office of the General Counsel Attorney; John Risch, Ford Employee; (3) Mark Tuneff, Ford Employee; John Risch, Ford Employee	(1) Jessica Zacharski, Ford's Office of the General Counsel Attorney; Michael O'Reilly, Ford's Office of the General Counsel Attorney; (2) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (3) Jessica Zacharski, Ford's Office of the General Counsel Attorney	(1) 4/13/2015; (2) 4/13/2015; (3) 4/13/2015	E-mail correspondence between Ford's Office of the General Counsel and Ford Employees relating to an incident. Produced in redacted form.	Attorney Client Privilege
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7	PE16-008 000015 CCRG - PE16-008 000020 CCRG	Email with Attachment	(1) Lokesh Setti, Ford Employee; (2) Mark Tuneff, Ford Employee	(1) Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Mark Tuneff, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney; (2) Lokesh Setti, Ford Employee; Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney	(1) Bharat Patel, Ford Employee; (2) Bharat Patel, Ford Employee	(1) 3/2/2015; (2) 3/2/2015	E-mail correspondence with attachment between Ford Employees and Attorneys and legal assistant in Ford's Office of the General Counsel reflecting legal advice and direction provided by Ford's Office of the General Counsel re 2011-2013 Explorer exhaust CO allegations and legal proceedings. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
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8	PE16-008 001001 RC - PE16-008 001238 RC	Email with Attachment	(1) Lokesh Setti, Ford Employee; (2) Mark Tuneff, Ford Employee	(1) Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Mark Tuneff, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney; (2) Lokesh Setti, Ford Employee; Will Parrish, Ford Employee; Tony Adamo, Ford Employee; David Ott, Ford Employee; Francis Wickenheiser, Ford Employee; Julie Lam, Ford's Office of the General Counsel Attorney; Jay Logel, Ford's Office of the General Counsel Attorney; Amanda Prescott, Ford Employee; Andrea Newlin, Ford's Office of the General Counsel Legal Assistant; Douglass Lampe, Ford's Office of the General Counsel Attorney	(1) Bharat Patel, Ford Employee; (2) Bharat Patel, Ford Employee	(1) 3/2/2015; (2) 3/2/2015	E-mail correspondence with attachment between Ford Employees and Attorneys and legal assistant in Ford's Office of the General Counsel reflecting legal advice and direction provided by Ford's Office of the General Counsel re 2011-2013 Explorer exhaust CO allegations and legal proceedings. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
9	PE16-008 000001 PC - PE16-008 000002 PC	Email with Attachment	Michael O'Reilly, Ford's Office of the General Counsel Attorney	Mark Tuneff, Ford Employee; John Risch, Ford Employee	Jessica Zacharski, Ford's Office of the General Counsel Attorney	5/11/2015	E-mail correspondence between Ford Employees and Ford's Office of the General Counsel reflecting legal advice regarding exhaust testers.	Attorney Client Privilege

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10	PE16-008 000003 PC - PE16-008 000006 PC	Email	(1) Michael O'Reilly, Ford's Office of the General Counsel Attorney; (2) Mark Tuneff, Ford Employee; (3) John Risch, Ford Employee; (4) John Risch, Ford Employee; (5) Michael O'Reilly, Ford's Office of the General Counsel Attorney; (6) Mark Tuneff, Ford Employee; (7) Michael O'Reilly, Ford's Office of the General Counsel Attorney; (8) Mark Tuneff, Ford Employee; (9) Jessica Zakarski, Ford's Office of the General Counsel Attorney	(1) Mark Tuneff, Ford Employee; John Risch, Ford Employee; (2) Michael O'Reilly, Ford's Office of the General Counsel Attorney; John Risch, Ford Employee; (3) Mark Tuneff, Ford Employee; Michael O'Reilly, Ford's Office of the General Counsel Attorney; (4) Mark Tuneff, Ford Employee; Michael O'Reilly, Ford's Office of the General Counsel Attorney; (5) John Risch, Ford Employee; Mark Tuneff, Ford Employee; (6) Michael O'Reilly, Ford's Office of the General Counsel Attorney; John Risch, Ford Employee; (7) Mark Tuneff, Ford Employee; John Risch, Ford Employee; (8) Michael O'Reilly, Ford's Office of the General Counsel Attorney; John Risch, Ford Employee; (9) Mark Tuneff, Ford Employee; Michael O'Reilly, Ford's Office of the General Counsel Attorney; John Risch, Ford Employee	(1) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (2) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (3) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (4) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (5) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (6) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (7) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (8) Jessica Zacharski, Ford's Office of the General Counsel Attorney	(1) 5/7/2015; (2) 5/7/2015; (3) 5/7/2015; (4) 5/8/2015; (5) 5/8/2015; (6) 5/8/2015; (7) 5/8/2015; (8) 5/8/2015; (9) 5/8/2015	E-mail correspondence between Attorney in Ford's Office of the General Counsel and Ford Employees reflecting legal advice regarding exhaust testers and mental impressions regarding legal strategy.	Attorney Client Privilege
11	PE16-008 000007 PC - PE16-008 000155 PC	Photographs	James Engle, Ford Employee			1/15/2015	Vehicle inspection photographs taken by Ford employee at the direction and request of Ford's Office of the General Counsel.	Attorney Work Product