

**RQ21-001
PRIVILEGE LOG**

Appendix K

Item No.	Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
1	RQ21-001 003864 RC - RQ21-001 003868 RC	Email	(1) Desi Ujkashevic, Ford Employee; (2) Jay Logel, Ford's Office of the General Counsel Attorney	(1) Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee; (2) Desi Ujkashevic, Ford Employee; Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee	(1) Jay Logel, Ford's Office of the General Counsel Attorney; Suzanne Ritter, Ford Employee; (2) Suzanne Ritter, Ford Employee	(1) 1/28/21; (2) 1/28/21	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a NHTSA Investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
2	RQ21-001 003869 RC - RQ21-001 003896 RC	Email with Attachments	(1) Desi Ujkashevic, Ford Employee; (2) Jay Logel, Ford's Office of the General Counsel Attorney	(1) Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee; (2) Desi Ujkashevic, Ford Employee; Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee	(1) Jay Logel, Ford's Office of the General Counsel Attorney; Suzanne Ritter, Ford Employee; (2) Suzanne Ritter, Ford Employee	(1) 1/28/21; (2) 1/28/21	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a NHTSA Investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
3	RQ21-001 003897 RC - RQ21-001 003902 RC	Email	(1) Desi Ujkashevic, Ford Employee; (2) Jay Logel, Ford's Office of the General Counsel Attorney	(1) Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee; (2) Desi Ujkashevic, Ford Employee; Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee	(1) Jay Logel, Ford's Office of the General Counsel Attorney; Suzanne Ritter, Ford Employee; (2) Suzanne Ritter, Ford Employee	(1) 1/28/21; (2) 1/28/21	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a NHTSA Investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
4	RQ21-001 003903 RC - RQ21-001 003911 RC	Email	(1) Desi Ujkashevic, Ford Employee; (2) Jay Logel, Ford's Office of the General Counsel Attorney	(1) Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee; (2) Desi Ujkashevic, Ford Employee; Hau Thai-Tang, Ford Employee; John Mellen, Ford's General Counsel; Cathy O'Callaghan, Ford Employee; Lisa Drake, Ford Employee; Kumar Galhotra, Ford Employee; Matt Field, Ford Employee; John Lawler, Ford Employee; Mitch Bainwol, Ford Employee; Mark Truby, Ford Employee; Monique Brentley, Ford Employee; Bob Holycross, Ford Employee; Chuck Gray, Ford Employee; Thomas Falahee, Ford's Assistant General Counsel; David Filipe, Ford Employee	(1) Jay Logel, Ford's Office of the General Counsel Attorney; Suzanne Ritter, Ford Employee; (2) Suzanne Ritter, Ford Employee	(1) 1/28/21; (2) 1/28/21	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a NHTSA Investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product

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5	RQ21-001 003912 RC - RQ21-001 003915 RC	Email	(1) Desi Ujkashevic, Ford Employee; (2) Amy Garby, Ford Employee	(1) Amy Garby, Ford Employee; Edward Pleet, Ford Employee; Adrian Diaz, Ford Employee; (2) Desi Ujkashevic, Ford Employee; Edward Pleet, Ford Employee; Adrian Diaz, Ford Employee	(1) Jay Logel, Ford's Office of the General Counsel Attorney; Suzanne Ritter, Ford Employee; (2) Jay Logel, Ford's Office of the General Counsel Attorney, Suzanne Ritter, Ford Employee	(1) 2/5/21; (2) 2/5/21	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a NHTSA Investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
6	RQ21-001 003916 RC - RQ21-001 003919 RC	Email	Kevin Hille, Ford Employee	John Popovecz, Ford Employee; John Ricks, Ford Employee; Jennifer Shaw, Ford Employee		9/29/2020	Confidential email which reflects actions by Ford's Office of the General Counsel and its legal strategies relating to a root cause investigation. Produced in redacted form.	Attorney Client Privilege
7	RQ21-001 000275 VI - RQ21-001 000278 VI	Email	(1) Jessica Clark, Ford's Office of the General Counsel Claims Analyst; (2) Andrew Chabot, Ford's Office of the General Counsel Claims Analyst; (3) Tony Dewitt, Ford Employee	(1) Andrew Chabot, Ford's Office of the General Counsel Claims Analyst; (2) Tony DeWitt, Ford Employee; (3) Andrew Chabot, Ford's Office of the General Counsel Claims Analyst; Steve Buelow, Ford Employee	(2) Andrew Chabot, Ford's Office of the General Counsel Claims Analyst; (3) David Ott, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Aaron Halonen, Ford Employee	(1) 2/27/20; (2) 3/17/20; (3) 3/17/20	Confidential e-mail correspondence between Ford's Office of the General Counsel Claims Analyst and a Ford Employee regarding a legal claim. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
8	RQ21-001 000726 ER - RQ21-001 000735 ER	Email with Attachments	Domenico Gabrielli, Ford Employee	Zachary Dunlap, Ford's Office of the General Counsel Attorney	Jessica Miller, Ford's Office of the General Counsel Legal Assistant; Domenico Gabrielli, Ford Employee	12/11/2020	Confidential e-mail correspondence between Ford Employee and an Attorney in Ford's Office of the General Counsel regarding a vehicle inspection. Produced in redacted form.	Attorney Client Privilege