

**PE22-007
PRIVILEGE LOG**

Item No.	Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
1	PE22-007 000415 ER - PE22-007 000416 ER	Email	David Simon, Ford Employee	David Filipe, Ford Employee, Frank Abkenar, Ford Employee, Said Deep, Ford Employee, Jagadish Sorab, Ford Employee, John Dunahay, Ford Employee, Michael Harrison, Ford Employee		2/5/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
2	PE22-007 004749 RC - PE22-007 004751 RC	Email	(1) David Simon, Ford Employee; (2) John Dunahay, Ford Employee	(1) David Filipe, Ford Employee, Frank Abkenar, Ford Employee, Said Deep, Ford Employee, Jagadish Sorab, Ford Employee, John Dunahay, Ford Employee, Michael Harrison, Ford Employee; (2) Said, Deep, Ford Employee	(2) David Filipe, Ford Employee; David Simon, Ford Employee; Frank Abkenar, Ford Employee; Jagadish Sorab, Ford Employee; Michael Harrison, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney	(1) 2/5/2022; (2) 2/5/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
3	PE22-007 004752 RC - PE22-007 004756 RC	Email	(1) Said Deep, Ford Employee; (2) Adrian Diaz, Ford Employee; (3) Jay Logel, Ford's Office of the General Counsel Attorney; (4) Said Deep, Ford Employee; (5) Said Deep, Ford Employee; (6) Jay Logel, Ford's Office of the General Counsel Attorney; (7) Said Deep, Ford Employee	(1) Adrian Diaz, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (2) Said Deep, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (3) Adrian Diaz, Ford Employee; Said Deep, Ford Employee; Karl Henkel, Ford Employee; (4) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (5) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (6) Said Deep, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (7) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee	(3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (7) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney	(1) 6/3/2022; (2) 6/3/2022; (3) 6/3/2022; (4) 6/3/2022; (5) 6/3/2022; (6) 6/3/2022; (7) 6/3/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
4	PE22-007 004757 RC - PE22-007 004763 RC	Email with Attachment	(1) Said Deep, Ford Employee; (2) Adrian Diaz, Ford Employee; (3) Jay Logel, Ford's Office of the General Counsel Attorney; (4) Said Deep, Ford Employee; (5) Said Deep, Ford Employee; (6) Jay Logel, Ford's Office of the General Counsel Attorney; (7) Said Deep, Ford Employee	(1) Adrian Diaz, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (2) Said Deep, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (3) Adrian Diaz, Ford Employee; Said Deep, Ford Employee; Karl Henkel, Ford Employee; (4) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (5) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (6) Said Deep, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (7) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee	(3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (7) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney	(1) 6/3/2022; (2) 6/3/2022; (3) 6/3/2022; (4) 6/3/2022; (5) 6/3/2022; (6) 6/3/2022; (7) 6/3/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product

**PE22-007
PRIVILEGE LOG**

5	PE22-007 004764 RC - PE22-007 004772 RC	Email	(1) Said Deep, Ford Employee; (2) Adrian Diaz, Ford Employee; (3) Jay Logel, Ford's Office of the General Counsel Attorney; (4) Said Deep, Ford Employee; (5) Said Deep, Ford Employee; (6) Jay Logel, Ford's Office of the General Counsel Attorney; (7) Said Deep, Ford Employee; (8) Said Deep, Ford Employee; (9) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (10) Adrian Diaz, Ford Employee	(1) Adrian Diaz, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (2) Said Deep, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (3) Adrian Diaz, Ford Employee; Said Deep, Ford Employee; Karl Henkel, Ford Employee; (4) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (5) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (6) Said Deep, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (7) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (8) David Ott, Ford Employee; (9) Said Deep, Ford Employee; David Ott, Ford Employee; (10) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Said Deep, Ford Employee; David Ott, Ford Employee	(3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (7) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (8) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (9) Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (10) Laura Beyer, Ford Employee; Karl Henkel, Ford Employee	(1) 6/3/2022; (2) 6/3/2022; (3) 6/3/2022; (4) 6/3/2022; (5) 6/3/2022; (6) 6/3/2022; (7) 6/3/2022; (8) 7/26/2022; (9) 7/26/2022; (10) 7/26/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
6	PE22-007 004773 RC - PE22-007 004781 RC	Email	(1) Said Deep, Ford Employee; (2) Adrian Diaz, Ford Employee; (3) Jay Logel, Ford's Office of the General Counsel Attorney; (4) Said Deep, Ford Employee; (5) Said Deep, Ford Employee; (6) Jay Logel, Ford's Office of the General Counsel Attorney; (7) Said Deep, Ford Employee; (8) Said Deep, Ford Employee; (9) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (10) Said Deep, Ford Employee; (11) Said Deep, Ford Employee; (12) Said Deep, Ford Employee	(1) Adrian Diaz, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (2) Said Deep, Ford Employee; Jay Logel, Ford's Office of the General Counsel Attorney; Karl Henkel, Ford Employee; (3) Adrian Diaz, Ford Employee; Said Deep, Ford Employee; Karl Henkel, Ford Employee; (4) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (5) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (6) Said Deep, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (7) Jay Logel, Ford's Office of the General Counsel Attorney; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (8) David Ott, Ford Employee; (9) Said Deep, Ford Employee; David Ott, Ford Employee; (10) Zachary Dunlap, Ford's Office of the General Counsel Attorney; David Ott, Ford Employee; (11) Zachary Dunlap, Ford's Office of the General Counsel Attorney; David Ott, Ford Employee; (12) Zachary Dunlap, Ford's Office of the General Counsel Attorney; David Ott, Ford Employee	(3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (7) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (8) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (9) Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (10) Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (11) Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee; (12) Laura Beyer, Ford Employee; Adrian Diaz, Ford Employee; Karl Henkel, Ford Employee	(1) 6/3/2022; (2) 6/3/2022; (3) 6/3/2022; (4) 6/3/2022; (5) 6/3/2022; (6) 6/3/2022; (7) 6/3/2022; (8) 7/26/2022; (9) 7/26/2022; (10) 7/26/2022; (11) 7/26/2022; (12) 7/26/2022	Confidential e-mail correspondence between Ford Employees and attorneys in Ford's Office of the General Counsel reflecting legal advice regarding a media inquiry. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
7	PE22-007 004792 RC	PowerPoint Slide	Ford's Office of the General Counsel	Ford's Automotive Safety Office		5/5/2022	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of obtaining legal advice. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
8	PE22-007 004802 RC	PowerPoint Slide	Ford's Office of the General Counsel	Ford's Automotive Safety Office		5/18/2022	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of obtaining legal advice. Produced in redacted form.	Attorney Client Privilege
9	PE22-007 004815 RC	PowerPoint Slide	Ford's Office of the General Counsel	Ford's Automotive Safety Office		5/26/2022	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of obtaining legal advice. Produced in redacted form.	Attorney Client Privilege