

Item No.	Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
1	PE23-015 000686 ER - PE23-015 000687 ER	Email	(1) Maria Buczkowski, Ford Employee; (2) David Smolarek, Ford Employee; (3) Kyle Sandefur, Ford's Office of the General Counsel Attorney	(1) David Smolarek, Ford Employee; (2) Maria Buczkowski, Ford Employee; (3) David Smolarek, Ford Employee; Maria Buczkowski, Ford Employee	(1) Jessica Zacharski, Ford's Office of the General Counsel Attorney; (2) Kyle Sandefur, Ford's Office of the General Counsel Attorney; Kevin Donovan, Ford Employee; (3) Kevin Donovan, Ford Employee; Douglass Lampe, Ford's Office of the General Counsel Attorney; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Luis Gomez, Ford's Office of the General Counsel Attorney	(1) 9/29/2023; (2) 9/29/2023; (3) 9/29/2023	Confidential e-mail correspondence between Ford Employees and an Attorney in Ford's Office of the General Counsel seeking legal advice regarding a NHTSA investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
2	PE23-015 000688 ER - PE23-015 000695 ER	Email	(1) David Smolarek, Ford Employee; (2) Kyle Sandefur, Ford's Office of the General Counsel Attorney; (3) Kyle Sandefur, Ford's Office of the General Counsel Attorney; (4) Erich Kemnitz, Ford Employee; (5) Kyle Sandefur, Ford's Office of the General Counsel Attorney	(1) Erich Kemnitz, Ford Employee; Matthew Fyie, Ford Employee; (2) David Smolarek, Ford Employee; Erich Kemnitz, Ford Employee; Matthew Fyie, Ford Employee; (3) David Smolarek, Ford Employee; Erich Kemnitz, Ford Employee; Matthew Fyie, Ford Employee; (4) Kyle Sandefur, Ford's Office of the General Counsel Attorney; David Smolarek, Ford Employee; Matthew Fyie, Ford Employee; (5) Erich Kemnitz, Ford Employee; David Smolarek, Ford Employee; Matthew Fyie, Ford Employee	(1) Tom Single, Ford Employee; Kevin Donovan, Ford Employee; Kyle Sandefur, Ford's Office of the General Counsel Attorney; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Tom Single, Ford Employee; Kevin Donovan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Tom Single, Ford Employee; Kevin Donovan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (4) Tom Single, Ford Employee; Kevin Donovan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (5) Tom Single, Ford Employee; Kevin Donovan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Kristin Pil, Ford's Office of the General Counsel Attorney	(1) 9/21/2023; (2) 9/21/2023; (3) 9/21/2023; (4) 9/21/2023; (5) 10/4/2023	Confidential e-mail correspondence between Ford Employees and an Attorney in Ford's Office of the General Counsel seeking legal advice regarding a vehicle inspection. Produced in redacted form.	Attorney Client Privilege Attorney Work Product