

Item No.	Bates Range	Document Type	Document Author(s)	Document Recipient(s)	Document cc's	Document Date	Document Description	Privilege (Basis of Claim)
1	PE23-021 000001 PC - PE23-021 000011 PC	Email with Attachment	Jonathan Strachan, Ford Employee	Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	Adam Brophy, Ford Employee; Paula Hultman, Ford Employee; Karen Boehk, Ford Employee; Barton Heldke, Ford Employee	1/30/2024	Confidential e-mail correspondence between Ford Employees and an Attorney in Ford's Office of the General Counsel regarding a Field Service Action.	Attorney Client Privilege Attorney Work Product
2	PE23-021 000012 PC - PE23-021 000013 PC	Email	(1) Jonathan Strachan, Ford Employee; (2) Laura Beyer, Ford Employee; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Jonathan Strachan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Laura Beyer, Ford Employee; Jonathan Strachan, Ford Employee; (4) Laura Beyer, Ford Employee; Jonathan Strachan, Ford Employee	(1) Adam Brophy, Ford Employee; Paula Hultman, Ford Employee; Karen Boehk, Ford Employee; Barton Heldke, Ford Employee; (2) Adam Brophy, Ford Employee; Paula Hultman, Ford Employee; Karen Boehk, Ford Employee; Barton Heldke, Ford Employee; (3) Adam Brophy, Ford Employee; Paula Hultman, Ford Employee; Karen Boehk, Ford Employee; Barton Heldke, Ford Employee; (4) Adam Brophy, Ford Employee; Paula Hultman, Ford Employee; Karen Boehk, Ford Employee; Barton Heldke, Ford Employee;	(1) 1/30/2024; (2) 1/31/2024; (3) 2/1/2024; (4) 2/1/2024	Confidential e-mail correspondence between Ford Employees and an Attorney in Ford's Office of the General Counsel regarding a Field Service Action.	Attorney Client Privilege Attorney Work Product
3	PE23-021 005283 ER - PE23-021 005294 ER	Email with Attachment	Paula Hultman, Ford Employee	Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Monica Sanchez, Ford Employee; George Raub, Ford Employee; Nitesh Jadhav, Ford Employee; Laura Beyer, Ford Employee; Jonathan Strachan, Ford Employee; Barton Heldke, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	Karen Boehk, Ford Employee	1/25/2024	Confidential e-mail correspondence between Ford Employees and an Attorney in Ford's Office of the General Counsel regarding a Field Service Action. Produced in redacted form.	Attorney Client Privilege
4	PE23-021 004352 RC - PE23-021 004354 RC	Email	Paula Hultman, Ford Employee	Nitesh Jadhav, Ford Employee; Maurici Pineda, Ford Employee; Antonietta Polsinelli, Ford Employee; Jonathan Strachan, Ford Employee; Jessica Zacharski, Ford's Office of the General Counsel Attorney; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Edward DeSmet, Ford Employee; George Raub, Ford Employee; Monica Sanchez, Ford Employee; Karen Stanhope, Ford Employee; Jim Chascsa, Ford Employee; Erich Kemnitz, Ford Employee; Jesus Arroyo, Ford Employee; Kevin Donovan, Ford Employee	David Ott, Ford Employee; Karen Boehk, Ford Employee; Andy Cooper, Ford Employee; Shane Brezee, Ford Employee; Kirk Leifson, Ford Employee; Tim Luikart, Ford Employee; Michelle Brown, Ford Employee; Jessica Easton, Ford Employee	3/30/2022	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
5	PE23-021 004355 RC - PE23-021 004403 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/30/2022	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
6	PE23-021 004404 RC - PE23-021 004477 RC	Email with Attachment	(1) Nitesh Jadhav, Ford Employee; (2) Ford's Automotive Safety Office	(1) Jesus Arroyo, Ford Employee; Paula Hultman, Ford Employee; Benjamin Ylima, Ford Employee; Edward DeSmet, Ford Employee; Jim Chascsa, Ford Employee; Mauricio Pineda, Ford Employee; (2) Ford's Office of the General Counsel	(1) Karen Stanhope, Ford Employee; George Raub, Ford Employee; Antonietta Polsinelli, Ford Employee; Jonathan Strachan, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Monica Sanchez, Ford Employee; Karen Boehk, Ford Employee; Michelle Browne, Ford Employee; Erich Kemnitz, Ford Employee; Tim Luikart, Ford Employee	(1) 3/28/2022; (2) 3/30/2022	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation and a 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
7	PE23-021 004478 RC - PE23-021 004542 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/1/2022	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	PE23-021 004543 RC - PE23-021 04585 PC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		6/8/2023	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
9	PE23-021 004586 RC - PE23-021 004644 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		11/1/2023	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
10	PE23-021 004645 RC	Document	Nitesh Jadhav, Ford Employee				Confidential document reflecting an Attorney in Ford's Office of the General Counsel advice regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product

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11	PE23-021 000014 PC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel			Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of obtaining legal advice.	Attorney Client Privilege Attorney Work Product
12	PE23-021 004646 RC - PE23-021 004655 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/18/2023	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
13	PE23-021 004656 RC - PE23-021 004705 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		10/19/2023	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
14	PE23-021 004706 RC - PE23-021 004740 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/25/2023	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
15	PE23-021 004741 RC - PE23-021 004783 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		9/14/2023	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
16	PE23-021 004784 RC - PE23-021 004840 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		11/1/2023	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
17	PE23-021 004841 RC - PE23-021 004879 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/28/2022	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
18	PE23-021 004880 RC - PE23-021 004918 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/29/2022	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
19	PE23-021 004919 RC - PE23-021 004957 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/30/2022	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
20	PE23-021 005295 ER - PE23-021 005299 ER	Email	(1) Adrian Diaz, Ford Employee; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; Jessica Zacharski, Ford's Office of the General Counsel Attorney; (2) Adrian Diaz, Ford Employee; Jessica Zacharski, Ford's Office of the General Counsel Attorney		(1) 3/3/2022; (2) 3/3/2022	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege
21	PE23-021 000015 PC - PE23-021 000016 PC	Email	Nitesh Jadhav, Ford Employee	Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee	Laura Beyer, Ford Employee; Edward DeSmet, Ford Employee; Benjamin Yilma, Ford Employee	6/26/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
22	PE23-021 000017 PC - PE23-021 000018 PC	Email	Nitesh Jadhav, Ford Employee	Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Benjamin Yilma, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee		5/24/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
23	PE23-021 000019 PC - PE23-021 000020 PC	Email	Nitesh Jadhav, Ford Employee	Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney		5/9/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege

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24	PE23-021 000021 PC - PE23-021 000022 PC	Email	Nitesh Jadhav, Ford Employee	Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee		4/19/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
25	PE23-021 000023 PC - PE23-021 000024 PC	Email	Nitesh Jadhav, Ford Employee	Benjamin Yilma, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee		2/8/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
26	PE23-021 004958 RC - PE23-021 005216 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		9/14/2023	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
27	PE23-021 005300 ER - PE23-021 005303 ER	Email	(1) Nitesh Jadhav, Ford Employee; (2) Nitesh Jadhav, Ford Employee; (3) Nitesh Jadhav, Ford Employee	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Adrian Diaz, Ford employee; (2) Adrian Diaz, Ford Employee; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Tom Single, Ford Employee; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Amelia Viramontes, Exponent Employee	(1) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 2/17/2023; (2) 5/26/2023; (3) 8/23/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
28	PE23-021 005217 RC - PE23-021 005252 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/25/2023	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
29	PE23-021 000025 PC - PRE23-021 000030 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Nitesh Jadhav, Ford Employee; (3) Nitesh Jadhav, Ford Employee; (4) Harrison Douglas, Ford Employee; (5) Nitesh Jadhav, Ford Employee; (6) Nitesh Jadhav, Ford Employee; (7) Harrison Douglass, Ford Employee; (8) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (9) Nitesh Jadhav, Ford Employee; (10) Nitesh Jadhav, Ford Employee; (11) Steve Nelson, Ford Employee; (12) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Nitesh Jadhav, Ford Employee; Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; Laura Beyer, Ford Employee; (2) Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (3) Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (4) Nitesh Jadhav, Ford Employee; Steven Nelson, Ford Employee; (5) Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (6) Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (7) Nitesh Jadhav, Ford Employee; Steven Nelson, Ford Employee; (8) Harrison Douglass, Ford Employee; Nitesh Jadhav, Ford Employee; Steven Nelson, Ford Employee; (9) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (10) Harrison Douglass, Ford Employee; Steven Nelson, Ford Employee; (11) Nitesh Jadhav, Ford Employee; Steven Nelson, Ford Employee; (12) Nitesh Jadhav, Ford Employee	(1) Benjamin Yilma, Ford Employee; Jim Chascsa, Ford Employee; Travis Henney, Ford Employee; Gregory Partaka, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (7) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (8) Laura Beyer, Ford Employee; (9) Laura Beyer, Ford Employee; (10) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (11) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 5/12/2023; (2) 5/21/2023; (3) 5/30/2023; (4) 5/30/2023; (5) 6/6/2023; (6) 6/12/2023; (7) 6/12/2023; (8) 6/12/2023; (9) 6/12/2023; (10) 7/5/2023; (11) 7/11/2023; (12) 7/11/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
30	PE23-021 000031 PC - PE23-021 000033 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (4) Amelia Viramontes, Exponent Employee; (5) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Amelia Viramontes, Exponent Employee; (4) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Nitesh Jadhav, Ford Employee	(1) Laura Beyer, Ford Employee	(1) 5/23/2023; (2) 5/23/2023; (3) 5/23/2023; (4) 5/30/2023; (5) 5/31/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
31	PE23-021 000034 PC - PE23-021 000035 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (3) Nitesh Jadhav, Ford Employee	(1) 4/25/2023; (2) 4/27/2023; (3) 5/5/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product

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32	PE23-021 000036 PC - PE23-021 000037 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (4) Nitesh Jadhav, Ford Employee; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee	(1) Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (3) Nitesh Jadhav, Ford Employee	(1) 4/25/2023; (2) 4/27/2023; (3) 4/28/2023; (4) 4/28/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
33	PE23-021 000038 PC - PE23-021 000039 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Nitesh Jadhav, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (2) Nitesh Jadhav, Ford Employee; Laura Beyer, Ford Employee		(1) 4/18/2023; (2) 4/19/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
34	PE23-021 000040 PC - PE23-021 000041 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Nitesh Jadhav, Ford Employee; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (4) Nitesh Jadhav, Ford Employee; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (4) Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee	(1) 2/24/2023; (2) 2/24/2023; (3) 3/2/2023; (4) 3/2/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
35	PE23-021 005304 ER - PE23-021 005305 ER	Email	Nitesh Jadhav, Ford Employee	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee	2/24/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
36	PE23-021 000042 PC - PE23-021 000045 PC	Email with Attachment	(1) Benjamin Yilma, Ford Employee; (2) Benjamin Yilma, Ford Employee	(1) Benjamin Yilma, Ford Employee; Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Ankrom Joshua, Ford Employee; (2) Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Kim Nick, Ford Employee; Martin Voelker, Ford Employee; Laura Beyer, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Kim Nick, Ford Employee; Martin Voelker, Ford Employee; Laura Beyer, Ford Employee	(1) 2/13/2023; (2) 2/14/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
37	PE23-021 005253 RC - PE23-021 005256 RC	Email	Nitesh Jadhav, Ford Employee	Benjamin Yilma, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	Jim Chascsa, Ford Employee; Laura Beyer, Ford Employee	2/3/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
38	PE23-021 005257 RC - PE23-021 005348 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		11/1/2023	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
39	PE23-021 000046 PC - PE23-021 000049 PC	Email with Attachment	(1) Nitesh Jadhav, Ford Employee; (2) Nitesh Jadhav, Ford Employee; (3) Nitesh Jadhav, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Allen Robinson, Ford Employee; (2) Allen Robinson, Ford Employee; (3) Allen Robinson, Ford Employee	(1) Benjamin Yilma, Ford Employee; (3) Benjamin Yilma, Ford Employee	(1) 2/10/2023; (2) 2/10/2023; (3) 2/17/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
40	PE23-021 005349 RC - PE23-021 05385 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/9/2022	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

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41	PE23-021 000050 PC - PE23-021 000063 PC	Email with Attachment	(1) Nitesh Jadhav, Ford Employee; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Benjamin Yilma, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (2) Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Benjamin Yilma, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee		(1) 5/24/2023; (2) 5/30/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege
42	PE23-021 005306 ER - PE23-021 005308 ER	Email	(1) Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Nitesh Jadhav, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Nitesh Jadhav, Ford Employee; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) Laura Beyer, Ford Employee; (2) Laura Beyer, Ford Employee; (3) Laura Beyer, Ford Employee	(1) 5/24/2023; (2) 5/24/2023; (3) 5/24/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
43	PE23-021 000001 FC - PE23-021 000013 FC	Email with Attachment	(1) Jeffrey Gebhart, Ford Employee; (2) Nitesh Jadhav, Ford Employee; (3) Jeffrey Gebhart, Ford Employee; (4) Nitesh Jadhav, Ford Employee; (5) Jeffrey Gebhart, Ford Employee; (6) Nitesh Jadhav, Ford Employee; (7) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (8) Nitesh Jadhav, Ford Employee; (9) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (10) Nitesh Jadhav, Ford Employee; (11) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; (2) Jeffrey Gebhart, Ford Employee; Benjamin Yilma, Ford Employee; Kenneth Chapman, GLS; (3) Nitesh Jadhav, Ford Employee; Benjamin Yilma, Ford Employee; Kenneth Chapman, GLS; (4) Jeffrey Gebhart, Ford Employee; Benjamin Yilma, Ford Employee; Kenneth Chapman, GLS; (5) Nitesh Jadhav, Ford Employee; Benjamin Yilma, Ford Employee; (6) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (7) Nitesh Jadhav, Ford Employee; (8) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (9) Nitesh Jadhav, Ford Employee; (10) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (11) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee	(1) Tyler Sears, Ford Employee; Andre Kumynetz, Ford Employee; (2) Tyler Sears, Ford Employee; Andre Kumynetz, Ford Employee; (3) Tyler Sears, Ford Employee; Andre Kumynetz, Ford Employee; (4) Tyler Sears, Ford Employee; Andre Kumynetz, Ford Employee; (5) Tyler Sears, Ford Employee; Andre Kumynetz, Ford Employee; (10) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee; (11) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 12/4/2023; (2) 12/4/2023; (3) 12/4/2023; (4) 12/4/2023; (5) 12/4/2023; (6) 12/7/2023; (7) 12/7/2023; (8) 12/12/2023; (9) 12/12/2023; (10) 12/12/2023; (11) 1/12/2024	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
44	PE23-021 000064 PC - PE23-021 000067 PC	Email with Attachment	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee; (2) Laura Beyer, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee	(1) 11/2/2023; (2) 11/3/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
45	PE23-021 000068 PC - PE23-021 000070 PC	Email with Attachment	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Jim Chascsa, Ford Employee	(1) 10/25/2023; (2) 10/25/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
46	PE23-021 000071 PC - PE23-021 000073 PC	Email with Attachment	(1) Jim Chascsa, Ford Employee; (2) Nitesh Jadhav, Ford Employee; (3) Nitesh Jadhav, Ford Employee	(1) Jim Chascsa, Ford Employee; Nitesh Jadhav, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Amelia Viramontes, Exponent Employee	(1) Chuck Reese, Ford Employee; Jerry Brown, Ford Employee; Laura Beyer, Ford Employee; (2) Laura Beyer, Ford Employee; (3) Laura Beyer, Ford Employee	(1) 8/1/2023; (2) 8/3/2023; (3) 8/9/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
47	PE23-021 000074 PC - PE23-021 000077 PC	Email with Attachment	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Jim Chascsa, Ford Employee; Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee	(1) 6/30/2023; (2) 7/5/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product

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48	PE23-021 000078 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (2) Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; Benjamin Yilma, Ford Employee	(1) Jim Chascsa, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 5/23/2023; (2) 5/23/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
49	PE23-021 000079 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; Edward DeSmet, Ford Employee; (2) Jim Chascsa, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 4/7/2023; (2) 4/11/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
50	PE23-021 005309 ER - PE23-021 005340 ER	Email	Nitesh Jadhav, Ford Employee	Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney		3/17/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege
51	PE23-021 000080 PC - PE23-021 000081 PC	Email with Attachment	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Nitesh Jadhav, Ford Employee; (2) Benjamin Yilma, Ford Employee; Edward DeSmet, Ford Employee	(1) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Jim Chascsa, Ford Employee	(1) 3/9/2023; (2) 3/9/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
52	PE23-021 00082 PC - PE23-021 000083 PC	Email	Zachary Dunlap, Ford's Office of the General Counsel Attorney	Emily Frascaroli, Ford Employee; Jim Chascsa, Ford Employee; Nitesh Jadhav, Ford Employee; Laura Beyer, Ford Employee; Tom Single, Ford Employee; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel		8/25/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
53	PE23-021 000084 PC - PE23-021 000085 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Gretchen Zobel, Ford Employee; (3) Jim Chascsa, Ford Employee; (4) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Gretchen Zobel, Ford Employee; Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Gretchen Zobel, Ford Employee; Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (4) Jim Chascsa, Ford Employee; Gretchen Zobel, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney		(1) 10/11/2023; (2) 10/11/2023; (3) 10/11/2023; (4) 10/11/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
54	PE23-021 000086 PC - PE23-021 000088 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (4) Nitesh Jadhav, Ford Employee; (5) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Nitesh Jadhav, Ford Employee; (5) Nitesh Jadhav, Ford Employee	(1) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (3) Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; (5) Amelia Viramontes, Exponent Employee; Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee	(1) 8/4/2023; (2) 8/4/2023; (3) 8/4/2023; (4) 8/9/2023; (5) 8/9/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product

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55	PE23-021 000089 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Jim Chascsa, Ford Employee; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Jim Chascsa, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 7/14/2023; (2) 7/18/2023; (3) 7/18/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
56	PE23-021 005366 ER - PE23-021 005390 ER	Email with Attachment	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Jim Chascsa, Ford Employee; Nitesh Jadhav, Ford Employee	Zachary Dunlap, Ford's Office of the General Counsel Attorney	6/28/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
57	PE23-021 000090 PC	Email	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Jim Chascsa, Ford Employee; Nitesh Jadhav, Ford Employee	Zachary Dunlap, Ford's Office of the General Counsel Attorney	6/23/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
58	PE23-021 000091 PC	Email	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney		6/22/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
59	PE23-021 005391 ER - PE23-021 005432 ER	Email with Attachment	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Jim Chascsa, Ford Employee; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Jim Chascsa, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (3) Jim Chascsa, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Nitesh Jadhav, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Nitesh Jadhav, Ford Employee; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Nitesh Jadhav, Ford Employee	(1) 5/31/2023; (2) 5/31/2023; (3) 5/31/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
60	PE23-021 000092 PC - PE23-021 000094 PC	Email	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee; (3) Nitesh Jadhav, Ford Employee; (4) Nitesh Jadhav, Ford Employee; (5) Nitesh Jadhav, Ford Employee; (6) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Nitesh Jadhav, Ford Employee; Jim Chascsa, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee; (3) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee; (4) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee; (5) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee; (6) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; Jim Chascsa, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (3) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (4) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (5) Zachary Dunlap, Ford's Office of the General Counsel Attorney; (6) Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 4/7/2023; (2) 4/12/2023; (3) 4/14/2023; (4) 4/20/2023; (5) 4/27/2023; (6) 4/27/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
61	PE23-021 000095 PC	Email	(1) Jim Chascsa, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Jim Chascsa, Ford Employee	(1) Nitesh Jadhav, Ford Employee; (2) Nitesh Jadhav, Ford Employee; Zachary Dunlap, Ford's Office of the General Counsel Attorney	(1) 4/20/2023; (2) 4/20/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product

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62	PE23-021 000096 PC	Email	(1) Nitesh Jadhav, Ford Employee; (2) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	(1) Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel; (2) Nitesh Jadhav, Ford Employee	(1) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee; (2) Zachary Dunlap, Ford's Office of the General Counsel Attorney; Laura Beyer, Ford Employee; Jim Chascsa, Ford Employee	(1) 2/14/2023; (2) 2/14/2023	Confidential e-mail correspondence between an Attorney in Ford's Office of the General Counsel, an outside Ford expert, and Ford Employees regarding an investigation.	Attorney Client Privilege Attorney Work Product
63	PE23-021 005504 RC - PE23-021 005545 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		10/24/2022	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
64	PE23-021 005386 RC - PE23-021 005430 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		9/29/2022	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
65	PE23-021 005431 RC - PE23-021 005466 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/25/2023	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
66	PE23-021 005467 RC - PE23-021 005502 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/25/2023	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
67	PE23-021 000097 PC - PE23-021 000108 PC	Excel Document	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Ford's Office of the General Counsel			Confidential spreadsheet prepared at the direction of Ford's Office of the General Counsel for the purpose of determining root cause for an investigation.	Attorney Client Privilege Attorney Work Product
68	PE23-021 000109 PC	Document	Nitesh Jadhav, Ford Employee	Ford's Office of the General Counsel			Confidential document prepared at the direction of Ford's Office of the General Counsel for the purpose of obtaining legal advice.	Attorney Client Privilege Attorney Work Product
69	PE23-021 000110 PC - PE23-021 000124 PC	PowerPoint Presentation	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Ford's Office of the General Counsel		10/23/2023	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of determining root cause and obtaining legal advice.	Attorney Client Privilege Attorney Work Product
70	PE23-021 000125 PC - PE23-021 000199 PC	PowerPoint Presentation	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Ford's Office of the General Counsel		8/28/2023	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of determining root cause and obtaining legal advice.	Attorney Client Privilege Attorney Work Product
71	PE23-021 000200 PC - PE23-021 000211 PC	PowerPoint Presentation	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Ford's Office of the General Counsel		11/2/2023	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of determining root cause and obtaining legal advice.	Attorney Client Privilege Attorney Work Product
72	PE23-021 005341 ER - PE23-021 005361 ER	Email with Attachment	Subbaiah Malladi, third-party consultant retained by Ford's Office of the General Counsel	Ford's Office of the General Counsel		11/2/2023	Confidential slide prepared at the direction of Ford's Office of the General Counsel for the purpose of determining root cause and obtaining legal advice. Produced in redacted form.	Attorney Client Privilege Attorney Work Product
73	PE23-021 000968 RC	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		1/25/2023	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

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74	PE23-021 000017 14D	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/30/2022	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
75	PE23-021 000108 14D	PowerPoint Slide	Ford's Automotive Safety Office	Ford's Office of the General Counsel		3/30/2022	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