

Item No.	Beginning Page ID	Document Type	Document Author(s)	Document Recipient(s)	Document cc(s)	Document Date	Document Description	Privilege (Basis of Claim)
001	RQ24-015_0000002876	Email with attachment	Hultman, Paula (R.) [prieden@ford.com]	Chascsa, Jim (JRCII.) [jchascsa@ford.com];DeSmet, Edward (E.J.) [edesmet@ford.com];Tovar de la Serna, Luz (L.A.) [LTOVARDE@ford.com];Raub, George (G.) [graub@ford.com];Jadhav, Nitesh (N.C.) [njadhav@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Boehk, Karen (K.S.) [kboehk@ford.com];Sanchez, Monica (MGSB.) [msanc162@ford.com]	1/25/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
002	RQ24-015_0000002877	Email with attachment	Hultman, Paula (R.) [prieden@ford.com]	Chascsa, Jim (JRCII.) [jchascsa@ford.com];DeSmet, Edward (E.J.) [edesmet@ford.com];Sanchez, Monica (MGSB.) [msanc162@ford.com];Raub, George (G.) [graub@ford.com];Jadhav, Nitesh (N.C.) [njadhav@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Boehk, Karen (K.S.) [kboehk@ford.com]	1/25/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
003	RQ24-015_0000002878	Email with attachment	Strachan, Jonathan (J.) [jstrach7@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Brophy, Adam (A.) [ABROPHY1@ford.com];Hultman, Paula (R.) [prieden@ford.com];Boehk, Karen (K.S.) [kboehk@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com]	1/30/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
004	RQ24-015_0000002879	Email	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Jadhav, Nitesh (N.C.) [njadhav@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Mena, Alfredo (A.) [amena14@ford.com];Parsons, Jeremy (J.) [JPARSO54@ford.com];Landt, Michael (M.R.) [mlandt1@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Smolarek, David (D.T.) [DSMOLAR3@ford.com];Brophy, Adam (A.) [ABROPHY1@ford.com];Lopez Maguina, Elizabeth (E.) [ELOPEZM1@ford.com]	2/8/2024	Email containing and seeking legal advice of counsel regarding investigation.	Both AC & WP

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005	RQ24-015_000002880	Email	Fletcher, Dolcina (D.) [DFLETC48@ford.com]	Landt, Michael (M.R.) [mlandt1@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Mena, Alfredo (A.) [amena14@ford.com];Parsons, Jeremy (J.) [JPARS054@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Smolarek, David (D.T.) [DSMOLAR3@ford.com];Brophy, Adam (A.) [ABROPHY1@ford.com];Lopez Maguina, Elizabeth (E.) [ELOPEZM1@ford.com]	2/7/2024	Email containing and seeking legal advice of counsel regarding investigation.	Attorney Client
006	RQ24-015_000002881	Email with attachment	Jadhav, Nitesh (N.C.) [njadhav@ford.com]	Heldke, Barton (B.L.) [bheldke@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Mena, Alfredo (A.) [amena14@ford.com];Parsons, Jeremy (J.) [JPARS054@ford.com];Landt, Michael (M.R.) [mlandt1@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Smolarek, David (D.T.) [DSMOLAR3@ford.com];Brophy, Adam (A.) [ABROPHY1@ford.com];Lopez Maguina, Elizabeth (E.) [ELOPEZM1@ford.com]	2/7/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
007	RQ24-015_000002882	Letter				2/7/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
008	RQ24-015_000002883	Letter				2/7/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
009	RQ24-015_000002884	Letter				2/7/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
010	RQ24-015_000002885	Email with attachment	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Jadhav, Nitesh (N.C.) [njadhav@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Mena, Alfredo (A.) [amena14@ford.com];Parsons, Jeremy (J.) [JPARS054@ford.com];Landt, Michael (M.R.) [mlandt1@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Smolarek, David (D.T.) [DSMOLAR3@ford.com];Brophy, Adam (A.) [ABROPHY1@ford.com];Lopez Maguina, Elizabeth (E.) [ELOPEZM1@ford.com]	2/9/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
011	RQ24-015_000002886	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
012	RQ24-015_000002887	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
013	RQ24-015_000002888	Email with attachment	Beyer, Laura (L.D.) [lbeyer4@ford.com]	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Jadhav, Nitesh (N.C.) [njadhav@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com]		2/9/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
014	RQ24-015_000002889	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
015	RQ24-015_000002890	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
016	RQ24-015_000002891	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
017	RQ24-015_000002892	Email with attachment	Strachan, Jonathan (J.) [jstrach7@ford.com]	Heldke, Barton (B.L.) [bheldke@ford.com]		2/9/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client

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018	RQ24-015_000002893	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
019	RQ24-015_000002894	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
020	RQ24-015_000002895	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
021	RQ24-015_000002896	Email with attachment	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Jadhav, Nitesh (N.C.) [njadhav@ford.com];Landt, Michael (M.R.) [mlandt1@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com]	Brophy, Adam (A.) [ABROPHY1@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com]	6/13/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
022	RQ24-015_000002897	Letter				6/13/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
023	RQ24-015_000002898	Letter				6/13/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
024	RQ24-015_000002899	Letter				6/13/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
025	RQ24-015_000002900	Email	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com]	Hultman, Paula (R.) [prieden@ford.com];Boehk, Karen (K.S.) [kboehk@ford.com];Brophy, Adam (A.) [ABROPHY1@ford.com];Mena, Alfredo (A.) [amena14@ford.com];Chacon, Jose (A.) [jchacon3@ford.com]	2/1/2024	Email containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
026	RQ24-015_000002901	Email	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com]	Brophy, Adam (A.) [ABROPHY1@ford.com];Hultman, Paula (R.) [prieden@ford.com];Boehk, Karen (K.S.) [kboehk@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com]	2/1/2024	Email containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
027	RQ24-015_000002902	Email with attachment	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Hultman, Paula (R.) [prieden@ford.com]		2/1/2024	Email with attachment containing legal advice of counsel regarding investigation.	Both AC & WP
028	RQ24-015_000002903	Memorandum				2/1/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
029	RQ24-015_000002904	Email with attachment	Hultman, Paula (R.) [prieden@ford.com]	Chascsa, Jim (JRCII.) [jchascsa@ford.com]		2/1/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
030	RQ24-015_000002905	Memorandum				2/1/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
031	RQ24-015_000002906	Email with attachment	Beyer, Laura (L.D.) [lbeyer4@ford.com]	Hultman, Paula (R.) [prieden@ford.com]		2/1/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
032	RQ24-015_000002907	Memorandum				2/1/2024	Memorandum containing legal advice of counsel regarding investigation.	Attorney Client
033	RQ24-015_000002908	Email with attachment	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Hultman, Paula (R.) [prieden@ford.com]		1/31/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
034	RQ24-015_000002909	Memorandum				1/31/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP

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035	RQ24-015_0000002910	Email with attachment	Dunlap, Zachary (Z.) [zdunlap@ford.com]	Hultman, Paula (R.) [prieden@ford.com]		1/31/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
036	RQ24-015_0000002911	Memorandum				1/31/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
037	RQ24-015_0000002912	Memorandum				2/9/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
038	RQ24-015_0000002913	Memorandum				6/13/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
039	RQ24-015_0000002914	Email				6/13/2024	Email containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
040	RQ24-015_000000892	Presentation				1/23/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
041	RQ24-015_000000949	Presentation				2/15/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
042	RQ24-015_0000001008	Presentation				1/30/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
043	RQ24-015_0000001070	Presentation				1/29/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
044	RQ24-015_0000001128	Presentation				1/25/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
045	RQ24-015_0000001195	Presentation				1/14/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
046	RQ24-015_0000001263	Presentation				1/18/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
047	RQ24-015_0000002915	Report				2/29/2024	Report containing legal advice of counsel regarding investigation.	Attorney Client
048	RQ24-015_0000002916	Email				1/5/2024	Email seeking legal advice of counsel regarding investigation.	Both AC & WP
049	RQ24-015_0000002917	Email				1/8/2024	Email seeking legal advice of counsel regarding investigation.	Both AC & WP
050	RQ24-015_0000002918	Report				2/5/2024	Report seeking legal advice of counsel regarding investigation.	Both AC & WP
051	RQ24-015_0000002919	Email with attachment	Heldke, Barton (B.L.) [bheldke@ford.com]	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Jadhav, Nitesh (N.C.) [njadhav@ford.com];Landt, Michael (M.R.) [mlandt1@ford.com]	Brophy, Adam (A.) [ABROPHY1@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com]	6/11/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
052	RQ24-015_0000002920	Memorandum				6/11/2024	Memorandum containing legal advice of counsel regarding investigation.	Attorney Client
053	RQ24-015_0000002921	Letter				6/11/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client

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054	RQ24-015_0000002922	Letter				6/11/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
055	RQ24-015_0000002923	Letter				6/11/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
056	RQ24-015_0000002924	Report				6/11/2024	Report containing legal advice of counsel regarding investigation.	Attorney Client
057	RQ24-015_0000002925	Report				6/11/2024	Report containing legal advice of counsel regarding investigation.	Attorney Client
058	RQ24-015_0000002926	Report				6/11/2024	Report containing legal advice of counsel regarding investigation.	Attorney Client
059	RQ24-015_0000002927	Email with attachment	Jadhav, Nitesh (N.C.) [njadhav@ford.com]	[REDACTED]	Beyer, Laura (L.D.) [lbeyer4@ford.com]; Sandefur, Kyle (K.D.) [KSANDEF1@ford.com]	12/6/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
060	RQ24-015_0000002928	Report				12/6/2024	Report containing legal advice of counsel regarding investigation.	Both AC & WP
061	RQ24-015_0000001628	Report				3/20/2024	Report containing legal advice of counsel regarding investigation.	Both AC & WP
062	RQ24-015_0000001650	Presentation				1/29/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
063	RQ24-015_0000001709	Presentation				2/15/2024	Presentation containing and seeking legal advice of counsel regarding investigation. Produced in redacted form.	Both AC & WP
064	RQ24-015_0000001914	Letter				7/2/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
065	RQ24-015_0000001920	Letter				7/2/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
066	RQ24-015_0000002929	Email with attachment	Jadhav, Nitesh (N.C.) [njadhav@ford.com]	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]; Heldke, Barton (B.L.) [bheldke@ford.com]; Beyer, Laura (L.D.) [lbeyer4@ford.com]; Strachan, Jonathan (J.) [jstrach7@ford.com]		2/9/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
067	RQ24-015_0000002930	Email	Heldke, Barton (B.L.) [bheldke@ford.com]	Beyer, Laura (L.D.) [lbeyer4@ford.com]; Jadhav, Nitesh (N.C.) [njadhav@ford.com]; Dunlap, Zachary (Z.) [zdunlap@ford.com]; Strachan, Jonathan (J.) [jstrach7@ford.com]		2/9/2024	Email containing and seeking legal advice of counsel regarding investigation.	Attorney Client
068	RQ24-015_0000002931	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
069	RQ24-015_0000002932	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client
070	RQ24-015_0000002933	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Attorney Client

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071	RQ24-015_0000002934	Email with attachment	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	Jadhav, Nitesh (N.C.) [njadhav@ford.com];Heldke, Barton (B.L.) [bheldke@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com];Strachan, Jonathan (J.) [jstrach7@ford.com]		2/9/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Both AC & WP
072	RQ24-015_0000002935	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
073	RQ24-015_0000002936	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
074	RQ24-015_0000002937	Letter				2/9/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
075	RQ24-015_0000002938	Email with attachment	Heldke, Barton (B.L.) [bheldke@ford.com]	Strachan, Jonathan (J.) [jstrach7@ford.com]		2/12/2024	Email with attachment seeking legal advice of counsel regarding investigation.	Both AC & WP
076	RQ24-015_0000002939	Letter				2/12/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
077	RQ24-015_0000002940	Letter				2/12/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
078	RQ24-015_0000002941	Letter				2/12/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
079	RQ24-015_0000002942	Email with attachment	Heldke, Barton (B.L.) [bheldke@ford.com]	Strachan, Jonathan (J.) [jstrach7@ford.com]		6/19/2024	Email with attachment seeking legal advice of counsel regarding investigation.	Both AC & WP
080	RQ24-015_0000002943	Letter				6/19/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
081	RQ24-015_0000002944	Letter				6/19/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
082	RQ24-015_0000002945	Memorandum				6/19/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
083	RQ24-015_0000002946	Memorandum				6/19/2024	Memorandum containing legal advice of counsel regarding investigation.	Both AC & WP
084	RQ24-015_0000002947	Report				6/19/2024	Report containing legal advice of counsel regarding investigation.	Both AC & WP
085	RQ24-015_0000002948	Letter				6/19/2024	Letter containing legal advice of counsel regarding investigation.	Both AC & WP
086	RQ24-015_0000002949	Email with attachment	DeSmet, Edward (E.J.) [edesmet@ford.com]	[REDACTED];Chascsa, Jim (JRCII.) [jchascsa@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com]		8/15/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
087	RQ24-015_0000002950	Presentation				8/15/2024	Presentation seeking expert advice of regarding investigation.	Work Product
088	RQ24-015_0000002951	Presentation				3/20/2024	Presentation seeking expert advice of expert consultant regarding investigation.	Work Product

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089	RQ24-015_0000002952	Presentation				8/2/2024	Presentation seeking expert advice of expert consultant regarding investigation.	Work Product
090	RQ24-015_0000002953	Presentation				6/20/2024	Presentation seeking expert advice of expert consultant regarding investigation.	Work Product
091	RQ24-015_0000002954	Report				6/20/2024	Report seeking expert advice of expert consultant regarding investigation.	Work Product
092	RQ24-015_0000002955	Email with attachment	DeSmet, Edward (E.J.) [edesmet@ford.com]	[REDACTED];Chasca, Jim (JRCII.) [jchasca@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Beyer, Laura (L.D.) [lbeyer4@ford.com]		8/15/2024	Email with attachment containing and seeking legal advice of counsel regarding investigation.	Attorney Client
093	RQ24-015_0000002956	Presentation				8/15/2024	Presentation seeking expert advice of expert consultant regarding investigation.	Attorney Client
094	RQ24-015_0000002763	Email with attachment	Jadhav, Nitesh (N.C.) [njadhav@ford.com]	Malladi, Subbaiah (S.V.) [smalladi@ford.com];Chasca, Jim (JRCII.) [jchasca@ford.com]	Dunlap, Zachary (Z.) [ZDUNLAP@ford.com]	1/12/2024	Email with attachment seeking expert advice of outside counsel regarding investigation.	Work Product
095	RQ24-015_0000002767	Presentation				1/12/2024	Presentation seeking expert advice of expert consultant regarding investigation.	Work Product
096	RQ24-015_0000002771	Memorandum				1/12/2024	Memorandum seeking expert advice of expert consultant regarding investigation.	Work Product
097	RQ24-015_0000002957	Email	[REDACTED]	Chasca, Jim (JRCII.) [jchasca@ford.com];Dunlap, Zachary (Z.) [ZDUNLAP@ford.com];Reese, Chuck (C.R.) [creese@ford.com]		6/20/2024	Email containing and seeking legal advice of counsel regarding investigation.	Work Product