
From: Montei, R. Spencer <RMontei@foley.com>
Sent: Wednesday, March 1, 2023 1:28 PM
To: Timothy Grochocinski
Cc: Gills, Jeanne M.; Austin Ginnings; Anna Shegay
Subject: RE: EPS - Mahle Behr Subpoena - Privilege Log

Tim,

MAHLE does not agree to produce a privilege log. Communications following the initiation of litigation are not logged and, even if there was an unusual obligation to log in this case, you could get a log from DTNA.

Regards,
Spencer

R. Spencer Montei

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From: Timothy Grochocinski <Timothy@nelbum.com>
Sent: Tuesday, February 28, 2023 12:40 PM
To: Montei, R. Spencer <RMontei@foley.com>
Cc: Gills, Jeanne M. <jmgills@foley.com>; Austin Ginnings <austin@nelbum.com>; Anna Shegay <anna@nelbum.com>
Subject: EPS - Mahle Behr Subpoena - Privilege Log

**** EXTERNAL EMAIL MESSAGE ****

Spencer –

You previously indicated that Mahle Behr would not be producing its communications with DTNA (including communications between counsel) because they were privileged under the common interest privilege. Can you please provide us with a privilege log for these communications?

Thank you,

Tim

Timothy E. Grochocinski | Attorney | P. 708.675.1974

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