



Christopher C. Smith <csmith@brookskushman.com>

Wed, Aug 25,
1:40 PM

to me, Helena, Michael, Barbara, Brian, Drew, FMCL0292L@brookskushman.com, John, Michael

Hi Michael,

Ford agrees to your edits to the scheduling order. You can file it on our behalf.

Regarding the source code, at this point Ford cannot commit to a particular date on source or the scope of any such production. We will work with plaintiff to enter into an appropriate source code discovery order and then proceed on a reasonable schedule thereafter.

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Michael Shanahan <michael@baileyduquette.com>

Wed, Aug 25,
2:42 PM

to Christopher, Helena, Michael, Barbara, Brian, Drew, FMCL0292L@brookskushman.com, John, M

Thanks Chris.

I will instruct Michael Farnan to file the agreed to scheduling modifications.

On the source code issue, I appreciate Ford's intent to cooperate to reach a mutually agreeable resolution. The primary point of my earlier email is to point out SDT requires a minimum of 6-8 weeks prior to the substantial document production completion deadline in order to analyze any relevant source code and lodge timely requests for additional documents that may arise out of that review so there is no confusion about SDT's needs regarding source production with respect to the agreed to Scheduling Order.

Thanks again.

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