

# **Exhibit 1**

## Mirsky, Sara J. (CIV)

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**From:** Bain, Adam (CIV)  
**Sent:** Monday, August 14, 2023 12:14 PM  
**To:** Zina Bash; Lipscomb, Bridget (CIV)  
**Cc:** J Edward Bell; Greenwald, Robin; Eric Flynn; Warren Postman  
**Subject:** RE: CL - Draft CMO  
**Attachments:** CLJA\_DOJ\_CMO\_2023\_08\_14.docx; CLJA\_CMO\_PLC\_Redline.docx; CLJA\_CMO\_Agenda\_2023\_08\_14.docx; CLJA\_ESI Protocol\_23\_08\_14.docx

Zina,

We are attaching our proposed CLJA Case Management Order, along with a redline showing changes that we've made to what you have proposed. We are also attaching an agenda for our discussion tomorrow. Finally, we are attaching a draft ESI order for your consideration. We would also be interested in your thoughts about protective orders to cover confidential information and privileged information under FRE 502(d). We are still discussing those orders internally and anticipate more time under the CMO to iron those out.

We look forward to meeting with you all tomorrow.

Best,

Adam



Adam Bain  
Environmental Torts Litigation  
U.S. Department of Justice  
Washington, DC  
202-616-4209 (Voice)  
202-598-0930 (Mobile)  
[adam.bain@usdoj.gov](mailto:adam.bain@usdoj.gov)

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**From:** Zina Bash <zina.bash@kellerpostman.com>  
**Sent:** Monday, August 07, 2023 2:39 PM  
**To:** Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>  
**Cc:** J Edward Bell <jeb@belllegalgroup.com>; Greenwald, Robin <RGreenwald@weitzlux.com>; Eric Flynn <EFlynn@belllegalgroup.com>; Warren Postman <wdp@kellerpostman.com>  
**Subject:** [EXTERNAL] CL - Draft CMO

Bridget and Adam,

Good afternoon. Attached is our draft CMO. As discussed, if you're able to send us proposed revisions by next Monday, we can discuss (and I hope resolve any disagreements!) live on Tuesday. Thanks.

**Zina Bash**

Partner

**Keller | Postman**

111 Congress Avenue, Suite 500 | Austin, TX, 78701

[512.620.8375](tel:512.620.8375) | [Email](#) | [Bio](#) | [Website](#)