

Exhibit 2

Mirsky, Sara J. (CIV)

From: Zina Bash <zina.bash@kellerpostman.com>
Sent: Thursday, October 5, 2023 10:49 AM
To: Platt, Elizabeth K. (CIV); Ed Bell
Cc: Lipscomb, Bridget (CIV); Bain, Adam (CIV); Turner, Joseph B. (CIV)
Subject: [EXTERNAL] RE: Production Protocol

Thank you, we'll review and be in touch.

Zina Bash
Partner

Keller | Postman

111 Congress Avenue, Suite 500 | Austin, TX, 78701
512.620.8375 | [Email](#) | [Bio](#) | [Website](#)

From: Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>
Sent: Thursday, October 5, 2023 8:15 AM
To: Zina Bash <zina.bash@kellerpostman.com>; Ed Bell <jeb@edbelllaw.com>
Cc: Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>; Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Turner, Joseph B. (CIV) <Joseph.B.Turner@usdoj.gov>
Subject: Production Protocol

Zina and Ed,

Please find our proposed changes to the Protocol attached.

As we mentioned on Friday, we believe the technical specifications should be outlined separately as an appendix for organization and clarity. Much of the redline in the document stems from moving those provisions to an appendix. We proposed this approach in our draft provided to you on August 14, 2023, and discussed at the meeting the following day. I attached our proposed draft and appendix here as it may be helpful to demonstrate this approach of including the specifications as an attached appendix.

If a call would be helpful to discuss the changes, please let me know and we can find a time that works.

Thank you,
Elizabeth



Elizabeth Platt
Environmental Torts Litigation
U.S. Department of Justice
Washington, DC
202-616-4211 (Office)
202-305-5871 (Mobile)
elizabeth.k.platt@usdoj.gov