

Exhibit 3

Mirsky, Sara J. (CIV)

From: Zina Bash <zina.bash@kellerpostman.com>
Sent: Thursday, October 26, 2023 11:13 AM
To: Platt, Elizabeth K. (CIV); Ed Bell; Eric Flynn
Cc: Bain, Adam (CIV); Lipscomb, Bridget (CIV)
Subject: [EXTERNAL] RE: Production Protocol
Attachments: Camp Lejeune Civil Production Specification -- 10.24 PLG redline_DOJ_ (PLG).docx

Elizabeth, thanks for these. Re word docs in native format, our team made a change to paragraph 10 clarifying that only word docs with hidden data should be produced in native format, as previously indicated in paragraph 5. While our team agreed that producing all word docs in native format is outside industry standard, they said that even the expanded image capturing metadata and redlines will not include information regarding the date a comment/change was made or the author of the comment/change.

Re bates numbering, the team believes that providing the expanded, imaged, and bates-numbered version along with the native for word docs with hidden text would solve the issue.

Would you be amenable to the above? Thanks!

Zina Bash
Partner

Keller | Postman

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

From: Platt, Elizabeth K. (CIV) <Elizabeth.K.Platt@usdoj.gov>
Sent: Wednesday, October 25, 2023 6:39 PM
To: Zina Bash <zina.bash@kellerpostman.com>; Ed Bell <jeb@edbelllaw.com>; Eric Flynn <eflynn@belllegalgroup.com>
Cc: Bain, Adam (CIV) <Adam.Bain@usdoj.gov>; Lipscomb, Bridget (CIV) <Bridget.Lipscomb@usdoj.gov>
Subject: Production Protocol

Zina, Ed, and Eric,

Please find the Production Protocol and Specifications attached. Additionally, here is the blog article explaining De-NISTing and the standard industry practice: <https://www.relativity.com/blog/demystifying-de-nisting/>

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