

# *Exhibit A*

## *Redacted Version of Document to be Sealed*

**From:** [John S. LeRoy](#)  
**To:** [Chris Stewart](#); [Liz Ranks](#); [Conrad Gosen](#); [neowireless@caldwellcc.com](#)  
**Cc:** [DL\\_Nissan-Neo@jenner.com](#); [dla-toyota-neowireless@us.dlapiper.com](#); [FCA-Neo@Venable.com](#); [MercedesNeoWireless@hoganlovells.com](#); [SERVICE] [GM/Neo](#); [Service-Honda/Neo](#); [SERVICE] [Tesla/Neo](#); [quadrozzi@youngpc.com](#); [VW-Neo@sternekessler.com](#); [FMCL0315L@brookskushman.com](#); [pmodi@jenner.com](#)  
**Subject:** RE: In re Neo Wireless - MDL-wide Discovery Issues  
**Date:** Friday, October 6, 2023 7:57:10 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image003.png](#)

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Chris,

With respect to [REDACTED]  
[REDACTED] Defendants might consider a stipulation broadly stating that Neo is not withholding *any communications* (including any and all charts, assessments, valuations, summaries, PowerPoints, emails, spreadsheets, etc.) [REDACTED]  
[REDACTED] We will address that possibility on our end, but until you receive something on behalf of all Defendants, you should respond *fully* to Defendants' motion assuming there is no resolution.

With respect to [REDACTED]  
[REDACTED] for reasons already stated in Defendants' motion. The *facts* of those cases are highly distinguishable for obvious reasons. Those cases support Defendants, not Neo.

Thanks,

John

**John LeRoy**  
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**From:** Chris Stewart <cstewart@caldwellcc.com>

**Sent:** Thursday, October 5, 2023 6:53 PM

**To:** John S. LeRoy <jleroy@brookskushman.com>; Liz Ranks <ranks@fr.com>; Conrad Gosen <gosen@fr.com>; neowireless@caldwellcc.com

**Cc:** DL\_Nissan-Neo@jenner.com; dla-toyota-neowireless@us.dlapiper.com; FCA-Neo@Venable.com; MercedesNeoWireless@hoganlovells.com; [SERVICE] GM/Neo <SERVICEGMNeo@fr.com>; Service-Honda/Neo <Service-Honda/Neo@fr.com>; [SERVICE] Tesla/Neo <SERVICETeslaNeo@fr.com>; quadrozzi@youngpc.com; VW-Neo@sternekessler.com; FMCL0315L@brookskushman.com; pmodi@jenner.com

**Subject:** RE: In re Neo Wireless - MDL-wide Discovery Issues

John,

I didn't [REDACTED] The [REDACTED] [REDACTED] as I made clear below. Which is why I was confused by the language in your motion suggesting this was just one of several things we were withholding. So by explaining that we're going to produce them, I was mooted all that remained of the dispute, with the sole exception of the separate and distinct discussion of a [REDACTED]

On the [REDACTED], you're learning more about it for the first time because you didn't ask any further questions about it or ask to confer further in the two weeks between the hearing and filing your motion. But [REDACTED]. So now you know that [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED] With that in mind, and setting aside [REDACTED], can you clarify—do you agree that [REDACTED] [REDACTED] are at least work product? In other words, is the only dispute [REDACTED]  
[REDACTED]

To be clear, we disagree with your motion on [REDACTED]. There is no requirement that [REDACTED] as your motion suggests. You cited a case where those happened to be the facts, but it's not the rule. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

And in any case, [REDACTED] does not require application of the common interest doctrine. Your motion cited an NDCA case [REDACTED]  
[REDACTED] but that is definitely not the standard in EDML. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

We'll explain all this to the Court if it's still in dispute, but please let me know what is in dispute now that you have more information, and if you'd like to discuss further by phone.

Thanks,  
Chris

Chris Stewart | Caldwell Cassady Curry PC  
214.888.4846

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**From:** John S. LeRoy <[jleroy@brookskushman.com](mailto:jleroy@brookskushman.com)>  
**Sent:** Thursday, October 5, 2023 1:04 PM  
**To:** Chris Stewart <[cstewart@caldwellcc.com](mailto:cstewart@caldwellcc.com)>; Liz Ranks <[ranks@fr.com](mailto:ranks@fr.com)>; Conrad Gosen <[gosen@fr.com](mailto:gosen@fr.com)>; [neowireless@caldwellcc.com](mailto:neowireless@caldwellcc.com)  
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Chris,

Defendants' motion requests more than [REDACTED]  
[REDACTED]  
[REDACTED]

This is the first I have heard of [REDACTED]  
[REDACTED] To the extent there is any doubt, Defendants expect [REDACTED]  
[REDACTED] You assert [REDACTED] "are clearly  
privileged and work product." But [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Thanks,

John

**John LeRoy**

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**From:** Chris Stewart <[cstewart@caldwellcc.com](mailto:cstewart@caldwellcc.com)>  
**Sent:** Wednesday, October 4, 2023 4:27 PM  
**To:** John S. LeRoy <[jleroy@brookskushman.com](mailto:jleroy@brookskushman.com)>; Liz Ranks <[ranks@fr.com](mailto:ranks@fr.com)>; Conrad Gosen <[gosen@fr.com](mailto:gosen@fr.com)>; [neowireless@caldwellcc.com](mailto:neowireless@caldwellcc.com)  
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**Subject:** RE: In re Neo Wireless - MDL-wide Discovery Issues

John,

We've reviewed defendants' motion to compel. It asks for a number of things we already agreed to provide (back on 9/12 in my email below), and mischaracterizes or misunderstands [REDACTED]

On the [REDACTED], all we said we [REDACTED]. But at any rate, having looked into it more, we'll just produce them [REDACTED]. We don't agree that they are relevant or will ultimately be admissible, and the Court didn't seem inclined to think so either. But we'll produce them to moot this dispute.

Regarding [REDACTED] I wish you would have asked us to clarify in the two weeks between the hearing and your motion (and I'm pretty sure

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