

Exhibit 1

Deliberative Process and Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
25	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Wilson, Harry < harrywilson@gmail.com >		ACP/DPP	Internal communications regarding plan for GM, Delphi, and Chrysler bankruptcies, and possible PBGC involvement.
60	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Osias, Brian < brian.osias@do.treas.gov >	Nathanson, Paul < paul.nathanson@do.treas.gov >	ACP/DPP	Internal communications regarding PBGC's potential percentage of GM's recovery and negotiating with the PBGC.
197	Bloom, Ron < Ron.Bloom@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov > Reilly, Meg < Meg.Reilly@do.treas.gov >		ACP/DPP	Internal communications regarding strategy for responding to press inquiries.
256	Markowitz, David < David.Markowitz@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >		DPP/ACP	Communications regarding plan for foreign subsidiaries in Delphi bankruptcy.
446	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP/DPP	Communications regarding Delphi bankruptcy mediations and press release strategy regarding same.
499	Deese, Brian C. < Brian C. Deese@who.eop.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >		ACP/DPP	Internal communications regarding Delphi workers' compensation claims and MI funding projections.
558	Rattner, Steven < Steven.Rattner@do.treas.gov >	Reilly, Meg < Meg.Reilly@do.treas.gov > Deese, Brian < Brian C. Deese@who.eop.gov > McNeill, Mara < Mara.McNeill@do.treas.gov > Bloom, Ron < Ron.Bloom@do.treas.gov > Wilson, Harry < Harry.Wilson@do.treas.gov > Feldman, Matthew < MatthewFeldman@dotreas.gov >		ACP/DPP	Internal communications regarding strategy for responding to press inquiries, including attorney advice re: same.

Deliberative Process and Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
679	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Bloom, Ron < Ron.Bloom@do.treas.gov >; Wilson, Harry < Harry.Wilson@do.treas.gov > ; Rattner, Steven < Steven.Rattner@do.treas.gov >; Nathanson, Paul < Paul.Nathanson@do.treas.gov >; Deese, Brian < Brian.C.Deese@who.eop.gov >; Ostias, Brian < Brian.Ostias@do.treas.gov >		ACP/DPP	Communications regarding plans for Delphi bankruptcy and potential discussions with DIP lenders.
685	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Deese, Brian < Brian.C.Deese@who.eop.gov >; Bloom, Ron < Ron.Bloom@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >; Rattner, Steven < Steven.Rattner@do.treas.gov >	ACP/DPP	Communications regarding counsel update on Delphi settlement discussions and possible press release.
768	Team Auto			DPP/ACP	Draft memorandum regarding PGBC's decision to take over the salaried and hourly pension plans of Delphi.
861	Feldman, Matthew	Nathanson, Paul < Paul.Nathanson@do.treas.gov >; Wilson, Harry < Harry.Wilson@do.treas.gov >		DPP/ACP	Internal communications about confirming Delphi issues with CWT
904	Feldman, Matthew	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP/DPP	Internal communications regarding CWT email regarding upcoming meeting with Skadden and scheduling of court conference.
1179	House, Joseph < House.Joseph@pbpc.gov >	Feldman, Matthew		ACP/DPP	Communications regarding draft pleading regarding PBGC and Delphi settlement.

Deliberative Process and Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
1181	House, Joseph < House.Joseph@pbg.c.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >		ACP/DPP	Communications regarding draft pleading regarding PBGC and Delphi settlement.
1204	McNeill, Mara < Mara.McNeill@do.treas.gov >	Malik, Sadiq < Sadiq.Malik@do.treas.gov >; Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Mondell, Dustin < dustin.mondell@us.rothschild.com >; Simmons, Lindsay < Lindsay.Simmons@do.treas.gov >	ACP/DPP	Attorney-client communications regarding plan for Delphi bankruptcy.
1235	Osius, Brian < Brian.Osius@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Nathanson, Paul < Paul.Nathanson@do.treas.gov >	ACP/DPP	Attorney-client communications regarding PBGC negotiations in connection with Delphi pension plans

Deliberative Process Privilege and Attorney Work Product Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
215				AWP/DPP	Draft Slide Presentation regarding Delphi bankruptcy and possible effect on GM.
238				AWP/DPP	Draft slide presentation regarding GM company funding projections. Delphi bankruptcy and possible effect on GM and auto industry supplier analysis.
607				DPP/AWP	Revisions to draft talking points for public comments re: government lending to auto industry.
983				DPP/AWP	Draft responses in Delphi bankruptcy mediations.
1052				DPP/AWP	Draft press release regarding Delphi bankruptcy mediations and auctioning of assets.
1211	Quinn, Philip < Philip.Quinn@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >		DPP/AWP	Internal communications regarding draft memorandum in connection with Delphi pension plan update.
1240				DPP/AWP	Attorney work product regarding Delphi pension plan analysis
1242				DPP/AWP	Attorney work product regarding Delphi pension plan analysis

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
67	US Department of Treasury			DPP/PCP	Internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
72	US Department of Treasury			DPP, PCP	Internal memorandum regarding recommendation, timeline, and rationale for strategy to position GM for success.
84	Team Auto	Lawrence Summers		DPP/PCP	Communications regarding plan for Delphi bankruptcy.
94	US Department of Treasury			DPP/PCP	Internal memorandum regarding recommendation, timeline, and rationale for strategy to position GM for success.
275				DPP/PCP	Internal draft memorandum regarding status of Delphi bankruptcy.
358	Fraser, Rob < Rob.Fraser@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >		DPP/PCP	Communications regarding internal questions about the "cost gap" between GM and Toyota labor rates and discussion of presidential memo re: same.
560	US Department of Treasury (TEAM AUTO)	Secretary Geithner Lawrence Summers		DPP/PCP	Internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
593	Steven Rattner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum regarding impressions and updating on GM and Chrysler restructuring plans.
596	Steven Rattner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum regarding impressions and updating on GM and Chrysler restructuring plans.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
599	Steven Ratner Ron Bloom	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum regarding impressions and updating on GM and Chrysler restructuring plans.
601	Steven Ratner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		DPP/PCP	Revised internal memorandum regarding impressions and updating on GM and Chrysler restructuring plans.
603	Steven Ratner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		DPP/PCP	Internal memorandum regarding impressions and updating on GM and Chrysler restructuring plans.
605	Steve Rathner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding impressions and updating of status of GM and Chrysler restructuring plans.
610	Mayock, Andrew < Andrew.Mayock@do.treas.gov >	Sperling, Gene < Gene.Sperling@do.treas.gov >; Krueger, Alan < Alan.Krueger@do.treas.gov >	Palomo, Victoria < Victoria.Palomo@do.treas.gov >; Adeyemo, Adeyale (Malib)	PCP/DPP	Internal communications outlining Geithner/Summers memorandum on upcoming restructuring announcement.
611	Steve Rathner Ron Bloom Diana Farrell Brian Deese	Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding materials related to upcoming restructuring announcement.
612	Adam P. Frankel			PCP/DPP	Redline draft of President's remarks regarding restructuring announcement.
619	Mayock, Andrew < Andrew.Mayock@do.treas.gov >	Adams, Marti < Marti.Adams@do.treas.gov >; Apsel, Sarah < Sarah.Apsel@do.treas.gov >	Additional "TO" Recipients: Rathner, Steven < Steven.Rathner@do.treas.gov >; Deese, Brian C. < Brian_C_Deese@who.eo.gov >	PCP/DPP	Weekly report to White House from Department of Treasury including update from Auto Task Force Group on Delphi Bankruptcy
621	Summers, Lawrence < Lawrence.Summers@who.eop.gov >	Rathner, Steven < Steven.Rathner@do.treas.gov >		DPP/PCP	Internal communications regarding strategy for public announcements on GM/Delphi restructuring.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
623	Team Auto	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum updating on plan negotiations re Chrysler/GM and settlement issues.
627	Team Auto	Secretary Geithner Lawrence Summers		DPP/PCP	Redline draft memorandum updating on GM restructuring, funding and other issues.
629	Team Auto	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum updating on GM restructuring, funding and other issues.
631	Team Auto	Secretary Geithner Lawrence Summers		DPP/PCP	Redline draft memorandum updating on GM restructuring, funding and other issues.
633	Team Auto	Secretary Geithner Lawrence Summers		DPP/PCP	Draft memorandum updating on GM restructuring, funding and other issues.
634	Steven Rathner Michael Tae	Secretary Geithner		DPP/PCP	Information memorandum discussing decisions relating to Treasury's potential ownership of GMAC.
638				DPP/PCP	Draft memorandum for meeting with Secretary Geithner and L. Summers re: GM capital structure negotiations and other issues.
668	US Department of Treasury	Secretary Geithner NEC Chairman Summers		DPP/PCP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
670	US Department of Treasury	Secretary Geithner NEC Chairman Summers		DPP/PCP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
672	US Department of Treasury	Secretary Geithner NEC Chairman Summers		DPP/PCP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
674	US Department of Treasury	Secretary Geithner NEC Chairman Summers		DPP/PCP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
676	US Department of Treasury	Secretary Geithner NEC Chairman Summers		DPP/PCP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
692				DPP/PCP	NEC memo regarding auto parts supplier analysis
758	Team Auto	Secretary Geithner, Lawrence Summers		DPP/PCP	Draft memorandum regarding GM restructuring update and issues.
759	Team Auto	Secretary Geithner, Lawrence Summers		DPP/PCP	Draft memorandum regarding GM restructuring update and issues.
760	Team Auto	Secretary Geithner, Lawrence Summers		DPP/PCP	Draft memorandum regarding GM capital structure negotiations and other issues.
761	Team Auto	Secretary Geithner, Lawrence Summers		DPP/PCP	Draft memorandum regarding GM capital structure negotiations and other issues.
762	Team Auto	Secretary Geithner, Lawrence Summers		DPP/PCP	Draft memorandum regarding GM capital structure negotiations and other issues.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
763	Deese, Brian C. <Brian C. Deese@who.eop.gov >	Bloom, Ron; Wilson, Harry; Feldman, Matthew		DPP/PCP	Communications regarding constituent communication with the President on auto industry matters.
764				DPP/PCP	Communications regarding constituent communication with the President on auto industry matters.
765	Feldman, Matthew	Deese, Brian C.	Wilson, Harry < Harry.Wilson@do.treas.gov >; Bloom, Ron	DPP/PCP	Communications regarding constituent communication with the President on auto industry matters.
766	Team Auto			DPP/PCP	Draft memorandum regarding PGBC's decision to take over the salaried and hourly pension plans of Delphi.
767	Feldman, Matthew	Deese, Brian C.	Wilson, Harry < Harry.Wilson@do.treas.gov >; Bloom, Ron	DPP/PCP	Communications regarding constituent communication with the President on auto industry matters.
770	US Department of Treasury	Secretary Geithner Lawrence Summers		PCP/DPP	Draft memorandum regarding impressions and updating on GM and Chrysler restructuring plans and viability determinations
771	US Department of Treasury	Secretary Geithner		PCP/DPP	Draft memorandum regarding responses to press inquiries to the Administration regarding potential auto industry bankruptcies
776	Wilson, Harry	Feldman, Matthew		PCP/DPP	Internal communications outlining Geithner/Summers memorandum on upcoming restructuring announcement.
777		Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding materials related to upcoming restructuring announcement

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
778	Adam P. Frankel			PCP/DPP	Redline draft of President's remarks regarding restructuring announcement
779				PCP/DPP	Internal document outlining findings regarding financial analysis/fundings re GM and Chrysler.
849	Team Auto	Lawrence Summers		DPP/PCP	Draft memorandum on Delphi's liquidity issues and potential consequences of Delphi shutdown.
856	Team Auto	Lawrence Summers		DPP, PCP	Draft memorandum on Delphi's liquidity issues and potential consequences of Delphi shutdown.
859	Team Auto	Lawrence Summers		DPP/PCP	Revised draft memorandum on Delphi's liquidity issues and potential consequences of Delphi shutdown
860	Team Auto	Lawrence Summers		DPP/PCP	Revised draft memorandum on Delphi's liquidity issues and potential consequences of Delphi shutdown
863	Team Auto	Lawrence Summers		DPP/PCP	Revised draft memorandum on Delphi's liquidity issues and potential consequences of Delphi shutdown.
944				DPP/PCP	Draft agenda for meeting with presidential advisors in connection with GM and Chrysler restructuring plans.
948	Team Auto	Geithner, Tim Summers, Lawrence		DPP/PCP	Draft memorandum for presidential advisors regarding GM and Chrysler restructuring plans.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
950	Team Auto	Geithner, Tim Summers, Lawrence		DPP/PCP	Draft memorandum for presidential advisors regarding GM and Chrysler restructuring plans.
956	Team Auto	Geithner, Tim Summers, Lawrence		DPP/PCP	Draft memorandum for presidential advisors regarding GM and Chrysler restructuring plans.
1006	Tim Geithner, Lawrence Summers			DPP/PCP	Draft memorandum regarding plans for GM reorganization and update on GM negotiations.
1089	Team Auto	Secretary Geithner Lawrence Summers		PCP/DPP	
1091	Team Auto	Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding GM organizational change and next steps.
1094	Team Auto	Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
1152	Team Auto	Secretary Geithner Lawrence Summers		PCP/DPP	Internal memorandum regarding auto industry update.
1168	Team Auto	Geithner, Timothy Summers, Lawrence		DPP/AWP/PCP	Draft memorandum for presidential advisors regarding GM and Chrysler restructuring plans.
1217	US Department of Treasury	Secretary Geithner Lawrence Summers		PCP/DPP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.

Presidential Communications Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
1219	US Department of Treasury	Secretary Geithner Lawrence Summers		PCP/DPP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.
1221	US Department of Treasury	Secretary Geithner Lawrence Summers		PCP/DPP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM
1223	US Department of Treasury			PCP/DPP	Draft internal memorandum regarding GM portfolio oversight and next steps analyzing value of investment in GM.

Attorney Work Product Doctrine Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
201				AWP	Attachment regarding plan for GM brownfield properties.
203				AWP	Attorney work product draft document regarding plan for GM brownfield properties.
207				AWP	Draft response to congressional inquiry on Delphi asset purchases.
220				AWP	Draft slides regarding auto industry captive finance company analysis.
792				AWP	Attorney work product draft memorandum regarding plan for GM reorganization.
1068	US Department of Treasury			AWP	Attorney work product regarding plan for Delphi reorganization.
1230				AWP	Attorney work product draft of third parties in connection with Delphi bankruptcy discovery.
1259				AWP	Attorney analysis/comments on Delphi reorganization plan.

Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
206	Weeks, Erik < Erik.Weeks@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >	Jaskowiak, Mark Mehta, Vikram	ACP	Communications regarding strategy for congressional communications on Delphi asset purchases.
208	Jaskowiak, Mark < Mark.Jaskowiak@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov > > Weeks, Erik < Erik.Weeks@do.treas.gov >	Mehta, Vikram < Vikram.Mehta@do.treas.gov >	ACP	Communications regarding strategy for congressional communications on Delphi asset purchases.
209	Weeks, Erik < Erik.Weeks@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov > >	Jaskowiak, Mark < Mark.Jaskowiak@do.treas.gov > > Mehta, Vikram < Vikram.Mehta@do.treas.gov >	ACP	Communications regarding strategy for congressional communications on Delphi asset purchases.
210	Yoo, Julia < Julia.Yoo@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov > >	Mehta, Vikram < Vikram.Mehta@do.treas.gov >	ACP	Communications regarding strategy for responding to oversight inquiries on Delphi asset purchases.
222	Snyder, Todd < todd.snyder@us.rothschild.com >	Feldman, Matthew < mfeldman@willkie.com > Brant, Josh < Josh.Brant@cw.com > Rapisardi, John < John.Rapisardi@cw.com >	Wilson, Harry < Harry.Wilson@do.treas.gov >	ACP	Attorney-client communications regarding plan for Delphi bankruptcy.
235	Osias, Brian < Brian.Osias@do.treas.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov > >		ACP	Attorney-client communications regarding GM-Delphi agreements.
242				ACP	Draft Slide Presentation regarding Delphi bankruptcy and possible effect on GM.

Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
320	Silver Point Capital			ACP	Draft financial spreadsheet regarding potential scenarios for Delphi bankruptcy.
430	Wilson, Harry < Harry.Wilson@do.treas.gov >	harrywilson@gmail.com		ACP	Attorney-client communications regarding plan for Delphi bankruptcy and communications from creditors re: same.
454	Wilson, Harry < Harry.Wilson@do.treas.gov >	Wilson, Harry < harrywilson@gmail.com >		ACP	Attorney-client communications regarding proposed amendments to Master Sale & Purchase Agreement for GM bankruptcy.
493	Wilson, Harry < Harry.Wilson@do.treas.gov >	harrywilson@gmail.com		ACP	Attorney-client communications regarding plan for Delphi bankruptcy and the Protective Order and Modification Procedures Order.
506	Feldman, Mathew < Matthew.Feldman@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Communications with internal legal counsel regarding responding to a meeting inquiry from an advisor to the DIP lenders in the Delphi bankruptcy.
658	Feldman, Mathew < Matthew.Feldman@do.treas.gov >	Wilson, Harry < Harry.Wilson@do.treas.gov >; Rattner, Steven < Steven.Rattner@do.treas.gov >; Bloom, Ron		ACP	Communications regarding Delphi bankruptcy mediations.
720	Bartley, Aaron	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Communications regarding GM loan amendments.

Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
727	Feldman, Matthew < mfeldman@willkie.com >	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Internal communications regarding Treasury department legal representation relating to Delphi bankruptcy.
774				ACP	Draft communications regarding plan for Delph bankruptcy
840	Feldman, Matthew	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Communications regarding draft memorandum regarding update on issues relating to Delphi bankruptcy.
936	Feldman, Matthew	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Attorney-client communications regarding plan for Delphi bankruptcy.
978	Feldman, Matthew	Wilson, Harry < Harry.Wilson@do.treas.gov >		ACP	Internal communications regarding Delphi bankruptcy mediations
985				ACP/AWP	Draft communications with the Court regarding Delphi bankruptcy mediations.
987				ACP, AWP	Draft communications with the Court regarding Delphi bankruptcy mediations.

Attorney Client Privilege Challenged

Item	Author	Addressee(s)	CC	Priv(s)	Reason
989				ACP/AWP	Draft communications with the Court regarding Delphi bankruptcy mediations.
1067	Nathanson, Paul	Feldman, Matthew; Wilson, Harry		ACP	Attorney-client communications regarding plan for Delphi reorganization.
1198	McNeill, Mara < Mara.McNeill@do.treas.gov >	Feldman, Matthew		ACP	Attorney-client communications regarding property asset data in connection with plan for GM bankruptcy.

Documents Challenged for Which No Privileged Was Asserted

Item	Author	Addressee(s)	CC	Priv(s)	Reason
205	House, Joseph < House.Joseph@pbgc.gov >	Feldman, Matthew < Matthew.Feldman@do.treas.gov >			Communications regarding plan for Delphi bankruptcy.
443					Treasury edits to draft GM statement regarding Delphi company funding projections.
662	Ricks, Morgan < Morgan.Ricks@do.treas.gov >	Sachs, Lee < Lee.Sachs@do.treas.gov >; Rattner, Steven < Steven.Rattner@do.treas.gov >; Schaffer, Laurie < Laurie.Schaffer@do.treas.gov >	Kabaker, Matthew < Matthew.Kabaker@do.treas.gov >; Stern, Brian < Brian.Stern@do.treas.gov >		Communications regarding draft memorandum regarding Stable Value Funds developments in connection with GM bankruptcy.
1090	harrywilson@gmail.com	Wilson, Harry Haley.Stevens@do.treas.gov < Sadiq.Malik@do.treas.gov >; markowitz@gmail.com >			Communications regarding Internal memorandum regarding GM organizational change and next steps.
1151	Feldman, Mathew	Feldman, Matthew < matthew.feldman.63@gmail.com > Deese, Brian < bdeese.wh@gmail.com >			Internal communications regarding draft of memorandum re: auto industry issues.

Deliberative Process Privilege Challenged

As detailed in Plaintiffs' Brief in Support of their Motion to Compel, Plaintiffs believe that the Treasury has failed to show that the deliberative process privilege applies to any of the responsive documents for which it has claimed the privilege.

Accordingly, Plaintiffs request that all 790 documents for which that is the only privilege cited by the Treasury be produced. This category consists of following privilege log items:

Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.
1	33	57	85	110	134	211	248
2	34	58	86	111	135	212	249
3	35	59	87	112	136	213	250
4	36	61	88	113	137	214	251
5	37	62	89	114	138	216	252
7	38	63	90	115	139	217	253
8	39	64	91	116	140	218	254
13	40	65	kha	117	142	219	255
14	41	66	93	118	144	221	257
15	42	68	95	119	145	223	258
16	43	69	96	120	146	224	259
17	44	70	97	121	151	228	260
18	45	71	98	122	152	229	261
19	46	73	99	123	153	231	262
20	47	74	100	124	154	232	263
21	48	75	101	125	155	233	265
24	49	76	102	126	156	234	266
26	50	77	103	127	162	236	267
27	51	78	104	128	164	237	268
28	52	79	105	129	165	239	269
29	53	80	106	130	179	240	270
30	54	81	107	131	185	241	271
31	55	82	108	132	198	244	272
32	56	83	109	133	199	247	273

Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.
274	276	277	278	279	280	281	282
283	284	285	286	287	288	289	290
291	295	296	297	298	299	301	302

Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.
304	355	396	450	508	542	583	622
305	356	398	451	512	543	584	624
306	360	400	452	519	544	586	625
307	361	401	453	520	545	587	626
308	363	404	459	521	547	588	628
318	367	407	460	522	548	589	630
329	377	409	471	523	549	590	632
330	378	411	472	524	551	591	635
331	379	412	473	525	552	592	636
332	380	414	474	527	553	594	637
333	381	415	475	528	554	595	639
337	382	432	484	529	555	597	640
338	383	433	485	530	556	598	641
339	384	435	486	531	557	600	642
340	385	436	487	532	561	602	643
341	386	437	488	533	562	604	644
342	387	438	489	534	563	606	645
345	388	439	490	535	564	613	646
347	389	442	494	536	565	614	647
348	390	444	495	537	566	615	648
350	392	445	496	538	567	616	649
351	393	447	498	539	570	617	650
353	394	448	500	540	575	618	651
354	395	449	502	541	582	620	652

Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.
686	716	752	804	828	864	893
687	717	753	805	829	865	894
688	718	754	806	830	866	895
689	719	755	807	831	867	896
690	721	756	808	832	868	897
691	722	769	809	833	869	898
693	723	775	810	834	873	899
694	725	780	811	835	874	900
695	726	781	812	839	875	901
696	731	782	813	841	876	902
697	737	783	814	844	877	903
699	738	784	815	845	878	909
700	739	785	816	846	880	910
702	741	786	817	847	881	911
704	742	788	818	848	883	912
706	743	789	819	850	884	913
707	744	796	820	851	885	914
709	745	797	821	852	886	915
710	746	798	822	853	887	916
711	747	799	823	854	888	917
712	748	800	824	855	889	918
713	749	801	825	857	890	938
714	750	802	826	858	891	939
715	751	803	827	862	892	940

Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.	Privilege Log Item No.
1029	1064	1104	1134	1186	1246
1030	1065	1106	1137	1187	1247
1031	1066	1107	1138	1188	1248
1032	1069	1108	1139	1189	1249
1033	1071	1111	1140	1190	1250
1034	1072	1112	1142	1194	1251
1035	1073	1113	1144	1195	1252
1036	1078	1116	1145	1196	1253
1037	1079	1117	1150	1207	1255
1038	1080	1118	1153	1208	1256
1039	1082	1119	1162	1209	1257
1040	1083	1120	1163	1210	1263
1041	1084	1122	1170	1212	1264
1048	1085	1123	1171	1213	1265
1049	1086	1124	1172	1214	1266
1050	1087	1125	1173	1216	1267
1051	1088	1126	1174	1218	1268
1053	1092	1127	1175	1220	1269
1054	1093	1128	1177	1222	1270
1055	1099	1129	1178	1228	1271
1058	1100	1130	1182	1237	1272
1059	1101	1131	1183	1239	1273
1062	1102	1132	1184	1241	
1063	1103	1133	1185	1245	