

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AB ELECTROLUX,

ELECTROLUX NORTH AMERICA, INC.,

and

GENERAL ELECTRIC COMPANY,

Defendants.

Case No. 1:15-cv-01039-EGS

ORDER

Upon consideration of the United States' Motion for a Protective Order and Additional Discovery, Defendants' response and the Government's reply thereto, for good cause shown, and substantially for the reasons articulated by the Government, the United States' motion is **GRANTED**.

IT IS HEREBY ORDERED that:

1. All contact between Electrolux (or its in-house counsel or outside counsel) and Mr. Truong (or his counsel) about the proposed acquisition or this litigation is prohibited, other than at depositions or at trial. Electrolux shall not delay or alter its obligations to Mr. Truong under his Separation Agreement. Electrolux

shall produce all documents, including solely internal documents, related to discussions about altering or delaying financial obligations to Mr. Truong;

2. Electrolux shall produce all communications between Electrolux's counsel (in-house or outside) and Mr. Truong (or his counsel) since Mr. Truong's separation from Electrolux, including all such documents that are in the business or personal files of Electrolux's senior executives, any member of the Electrolux Board of Directors, and any other persons involved in setting or delaying Electrolux's financial obligations to Mr. Truong;

3. Electrolux shall produce all communications between Electrolux counsel (in-house or outside) and non-parties (or their related entities or counsel) that are in the business or personal files of any Electrolux counsel (in-house or outside), their staff, or other Electrolux employees acting at counsel's direction, whether created before or after the filing of the Complaint;

4. Electrolux shall prepare and produce a written memorialization of all oral communications between Electrolux's counsel (in-house and outside) and non-parties (or their related entities or counsel) about their testimony or participation in the investigation or

litigation (subject to the exclusion in CMO Paragraph 4 of interview notes, interview memoranda, or a recitation of facts contained in such notes or memoranda);

5. Electrolux shall produce any of the above documents that are withheld or redacted for *in camera* review, accompanied by an appropriate privilege log;
6. The discovery deadline is hereby waived for the purpose of the United States' discovery related to this matter, including up to five (5) additional depositions; and
7. All documents Electrolux must produce pursuant to this Order shall be produced no later than 12:00 p.m. Friday, October 9, 2015.

SO ORDERED.

Signed: Emmet G. Sullivan
United State District Judge
October 5, 2015