## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

FEDERAL TRADE COMMISSION,	
Petitioner,	Case. No. 13-mc-00131-P1 (AKH)
THE WESTERN UNION COMPANY,	(Nature of Case M 18-304: Administrative Subpoena Proceedings)
LONNIE KEENE, MONITOR, STATE OF ARIZONA v. WESTERN UNION FINANCIAL SERVICES, INC., KEENE CONSULTING ARIZONA, LLC,	USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC#:
Respondents.	DATE FILED: 12/9/13

## STIPULATION FOR ENTRY OF TROPOSED ORDER

WHEREAS, on November 8, 2013, the Federal Trade Commission ("FTC") filed its

Application for an Order to Show Cause Why The Western Union Company ("Western Union")

Should Not Be Held In Civil Contempt (Dkt. 58);

WHEREAS, the Court entered an Order to Show Cause on November 13, 2013 (Dkt. 57);

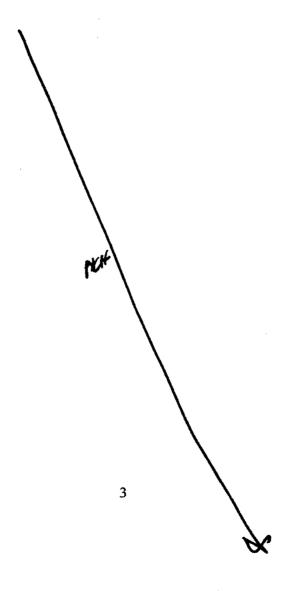
WHEREAS, Western Union opposed the FTC's motion (Dkt. 63) and filed a Motion for Protective Order on November 27, 2013 (Dkt. 61);

WHEREAS, the Court set a hearing on these pending matters for December 11, 2013;

IT IS HEREBY STIPULATED AND AGREED by the FTC and Western Union (the "parties"), and ORDERED by the Court, as follows:

- 1. Western Union shall identify non-privileged, responsive documents "referring or relating to communications with the Monitor" by applying the "final search protocol" with respect to both custodians and search terms that, pursuant to the Court's order of June 7, 2013, the FTC designated in the August 8, 2013, letter sent by Burke W. Kappler, Attorney, Office of General Counsel, FTC, to Edward B. Schwartz of Steptoe & Johnson LLP, a copy of which is appended hereto as Exhibit A. The parties agree that the definitions reflected in the FTC's December 12, 2012, Civil Investigative Demand ("CID") sent to Western Union (Dkt. 1 at 25-36) continue to apply.
- Western Union shall complete its production of documents responsive to the FTC's CID
  by January 22, 2014, and produce the requisite privilege log and certificate of compliance
  relating to that production on or before February 15, 2014.
- 3. Western Union shall produce documents on a rolling basis in accordance with the schedule attached hereto as Exhibit B. Under this schedule, Western Union shall make a First Round Production of all responsive documents not identified as potentially privileged from the files of the designated custodians. Western Union shall then expeditiously review the documents designated as potentially privileged and produce all non-privileged responsive documents (the "Second Round Production") no later than January 22, 2014.
- 4. Western Union enters into this Stipulation and Order to resolve the present dispute and in no way concedes that it has violated the Court's June 7 Order.
- 5. Western Union's implementation of the June 7 Order and this Stipulation and Order shall be without prejudice to, or waiver of (1) the rights of either party to challenge the June 7 Order in the pending appeals (Nos. 13-3100 and 13-3272), or any subsequent proceeding;

- (2) the right of the FTC to issue further investigative demands to Western Union; (3) Western Union's right to challenge any other existing or future CID or request for information issued by the Federal Trade Commission; (4) any objection in this or any subsequent proceeding as to the admissibility or relevance of any documents or other materials Western Union produces in response to the CID, as enforced; or (5) the claims of either party regarding any document(s) withheld by Western Union from production under a claim of legal privilege.
- 6. Western Union's Motion for Protective Order (Dkt. 61) is hereby withdrawn.
- 7. Upon entry of this Stipulation and Order, the hearing scheduled for December 11 is vacated.



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Dated: /2/9/2013

By:

Burke W. Kappler

Attorney

Leslie Rice Melman

Assistant General Counsel for Litigation PEDERAL TRADE COMMISSION 600 Pennsylvania Ave., NW

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Attorneys for Petitioner Federal Trade Commission Dated: 12-6-13

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Rv

David Fallek

THE WESTERN UNION COMPANY
12500 East Belford Avenue

Englewood, CO 80112

IT IS SO ORDERED:

HON. ALVIN K. HELLERSTEIN

United States District Judge

Dated: December 2, 2013 New York, NY

## **EXHIBIL A**

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#### UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Burke W. Kappler Attorney Office of General Counsel Direct Dial: 202-326-2043 Fax: 202-326-2477 E-mail: bkappler@ftc.gov

August 8, 2013

BY E-MAIL

Edward B. Schwartz, Esq. Steptoe & Johnson, LLP 1330 Connecticut Avenue, NW Washington DC 20036 eschwartz@steptoe.com

RE: FTC v. The Western Union Company, et al., 13-mc-0131-AKH (S.D.N.Y. 2013)

Dear Ed:

I am writing in regard to our discussions about Western Union's compliance with Specification 2 of the Civil Investigative Demand enforced by Judge Hellerstein on June 7, 2013 (June 7 Order). To provide some context for this letter, I think it will be helpful to first review our prior communications regarding Western Union's compliance with the Court's Order.

# A. Judge Hellerstein's enforcement order (June 7, 2013) and Western Union's proposed protocol (June 20, 2013)

As you know, Specification 2 calls for "[a]ll documents referring or relating to communications with the Monitor appointed by the court in State of Arizona ex rel. Horne v. Western Union Financial Services, Inc. . . . . " Judge Hellerstein's June 7 Order established an iterative procedure for Western Union's compliance. Specifically, the Order required Western Union to provide the FTC a proposed protocol for searching for responsive documents, to which the FTC could then respond with additional search terms and/or custodians. Western Union would then have 5 days to advise the FTC if any of the additional search terms or custodians

Western Union produced documents responsive to Specification 1, which calls for "all documents referring or relating to complaints made to Western Union by consumers anywhere in the world, referring or relating to fraud-induced money transfers[,]" on July 30, 2013. As I advised Jose Gonzalez-Magaz by telephone on August 2, 2013, our preliminary review of this production suggests that it is incomplete. Our review is ongoing, however, and we will be in touch shortly on any specific deficiencies.

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were over- or under-inclusive "with a statement of specific reasons for its position and supporting data . . . ."

Pursuant to the Order, Western Union provided a proposed protocol on June 20, 2013. In this protocol, Western Union proposed searching for records reflecting direct communications with the Monitor and his team by searching for e-mail from 10 individuals associated with the Monitor. Western Union further proposed searching for records from Western Union employees who regularly interacted with the Monitor by searching the e-mail of only 10 custodians. Western Union proposed such a limited search despite the fact that it represented to the Court that there were "no fewer than 57 custodians whose e-mails would have to be searched." (Tr. at 24.) Western Union also proposed conducting these searches using only 7 "base" search terms and to search for these terms in conjunction with 7 "limiting" terms.<sup>2</sup>

## B. The FTC's response to the proposed protocol (July 17, 2013) and Western Union's objections (July 22, 2013)

On July 17, 2013, the FTC responded by proposing additional custodians and search terms. These additional custodians and terms were developed based on staff's own review of the Monitor's reports, as well as discussions with the Monitor regarding those representatives of Western Union with whom he and his team had contact, and the contents of the reports. For example, in addition to the 10 custodians proposed by Western Union, the Monitor identified another 104 Western Union employees in his reports as having substantive contact with him or members of his team. Together with members of Western Union's management team and board of directors – those who would or should have been aware of the Monitor's evaluations and recommendations and who would have had responsibility for overseeing Western Union's implementation of changes recommended by the Monitor – that brought the total number of the FTC's suggested custodians to 136 individuals. The FTC also proposed a total of 28 additional base search terms and 14 additional limiting search terms, which reflected key synonyms or concepts identified in the Monitor's reports.

You responded by letter dated July 22, 2013, and conveyed Western Union's objections to several aspects of the FTC's response. According to Western Union, the Commission's response was overbroad and not consistent with the Federal Rules or with the Sedona Conference's principles for electronic discovery. You stated that the Commission should not include any custodian named in one of the Monitor's reports without analyzing the extent of that individual's interaction with the Monitor and role at Western Union. And, despite admitted technical difficulties that hampered its ability to search its e-mail, the company objected to

Western Union's proposed protocol suggested searching for a limited set of "base" terms in Boolean conjunction with a set of "limiting" terms. The FTC agrees with this basic approach, but finds based on its review of the Monitor's reports and discussions with the Monitor that both sets of terms must be expanded.

The FTC could have proposed that Western Union search for any employee with responsive documents, regardless of whether that individual was named in the Monitor's reports — a potentially much larger set of custodians. Instead, the FTC proposed searching the files of those named by the Monitor himself for documents relating to communications with the Monitor, which is a more limited, natural, and reasonable starting point.

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specific search terms.<sup>4</sup> Nonetheless, Western Union stated it was willing to include another 22 custodians from the FTC's list, for a total of 32 custodians. Finally, you proposed that counsel for Western Union and the FTC meet and confer regarding the FTC's response and next steps in developing a search protocol for documents responsive to Specification 2.

We met, even though we disagreed with a number of Western Union's premises. For instance, we disagreed that the relevant standard for assessing Western Union's compliance are the discovery rules in the Federal Rules of Civil Procedure. To the contrary, Western Union's compliance must be measured against the terms of Judge Hellerstein's June 7 Order. Similarly, though the Sedona Conference has produced helpful guidance on electronic discovery, the standard Western Union cited relates to a party's obligation to search and produce potentially duplicative information from secondary back-up tapes and other inaccessible storage media and is not relevant to Western Union's obligations to produce documents from reasonably accessible "first tier" custodians under the June 7 Order. We also disagreed that it is the FTC's burden to identify which custodians are most likely to have responsive information based on their interactions with the Monitor; by definition, Western Union has the best information regarding a given custodian's interaction with the Monitor and thus it is Western Union's burden to demonstrate why a particular proposed custodian is unlikely to have responsive information. Finally, we disagreed that the Commission's proposed protocol response was overbroad. In fact, in searching for documents related to communications with the Monitor, Western Union's task was limited to responding to only a single part of a single specification in a CID that itself contained only two specifications. Under these circumstances, the universe of responsive documents should not be difficult for Western Union to identify quickly.

### C. Western Union's revised proposals (July 30, 2013)

Leslie Melman and I met with you and Jose on July 30, 2013. During the meeting, you explained that Western Union believed that searching for the custodians and terms proposed by the FTC would be highly burdensome. Though you did not provide extensive supporting data, you stated that 30 custodians could be expected to have 5 million e-mails. When Leslie and I asked how the FTC could identify who among the 114 Western Union employees identified in the Monitor's reports had sufficiently substantive interactions with the Monitor to justify their inclusion, you offered to provide more detailed information about each of the custodians. However, you also stated that such information would likely be time-consuming for Western Union to prepare and ultimately was not likely to be helpful. With respect to the search terms, you explained that the terms as provided by the FTC were similarly burdensome because they would be complicated to implement and would likely result in a large number of hits.

To resolve these issues, you proposed that the FTC consent to further reductions in the number of custodians, subject to the FTC's right to require additional, targeted searches if the

We understand that Western Union has resolved several of its technical objections to the search terms by retaining a vendor whose search capabilities exceed Western Union's own.

documents produced highlighted other individuals as likely to have responsive information. You also proposed that the FTC consent to reduce the number of search terms. Specifically, you proposed reducing the base search terms to a core set that referred to the Monitor, and then applying these terms in conjunction with various limiting terms.

## D. The search protocol required for Western Union's compliance with the June 7 Order

Western Union has not provided any support for its request that the FTC consent to reductions in both the numbers of custodians and the numbers of search terms. To be clear, Western Union offered only limited information to justify such reductions in the July 22 letter, and has offered no further substantive information since our meeting on July 30. Notably, the company has not advised the FTC whether any of the search terms are "overinclusive or underinclusive, with a statement of specific reasons for its position and supporting data[,]" as required by the June 7 Order. Nonetheless, after undertaking a further review of each of the Monitor's reports and additional discussion with the Monitor, we have further limited the list of custodians and search terms that Western Union must use to comply with the Court's enforcement order. The final search protocol is attached to this letter.

As you will see, this represents a reduction of nearly 50%, from 136 to 74 key individuals. These include 61 employees identified in the Monitor's reports and 13 additional members of Western Union's management team. With respect to search terms, we accept in large part Western Union's proposal to use terms referring to the Monitor and his team as a core set of base terms to be used in conjunction with a set of limiting terms, and we have revised the limiting terms to reflect many of the key concepts included in the FTC's original response. In doing so, we reserve our rights to require Western Union to perform targeted searches for additional custodians or search terms once we have had the opportunity to review Western Union's initial production. You offered to do this during our July 30 meeting, and Judge Hellerstein explicitly ordered Western Union to do so in paragraph 15 of the June 7 Order.

The revised response also addresses search and production of electronic documents outside of e-mail, and search and production of hard copy, non-electronic documents. In addition, to the extent that Western Union is aware of documents that are responsive to the CID, but that somehow fall outside of the search protocol, Western Union is obligated to produce these documents, consistent with Judge Hellerstein's finding at the May 28, 2013 hearing that the search terms "will not limit what is relevant." (Tr. at 26.)

Jose Gonzalez-Magaz later confirmed by telephone that Western Union's vendor has the capability to run such targeted searches.

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As I advised Jose Gonzalez-Magaz by telephone, this is the response contemplated by paragraph 14 of the June 7 Order. Accordingly, Western Union "shall accept the FTC's response and, within 15 days of the FTC's response, or at such later time as may be agreed by the FTC, produce all of the documents identified as a result of its execution of the protocol and the FTC's response[.]"

While this letter was being prepared, we received your letter of August 7, advising us that Western Union had not yet begun to collect responsive information, that collection alone for a set of 32 custodians would require at least one month, not including review and production, and that the costs of the production from these 32 custodians could be expected to exceed \$3 million. We were surprised to receive this, as we had never consented to a set of 32 custodians and in fact told Western Union that we were undertaking a second review of the Monitor's reports in conjunction with the information provided at the July 30 meeting. Indeed, we undertook such a detailed second look because we were cognizant of the costs to Western Union, though we note that many of these costs are attributable to Western Union's own decisions to involve 114 employees with the Monitor's assessments, and to employ its apparently cumbersome e-mail journaling system.

We were further surprised that Western Union had not previously undertaken to collect information from any custodians, given that Western Union was served with the CID around December 12, 2012, and has been bound by a federal district court enforcement order for over two months. We have reviewed this situation with our Principal Deputy General Counsel. At this point, we expect that Western Union will begin a rolling production of documents within 15 days and adhere to a schedule that provides for full and complete compliance no later than October 31, 2013.

Attachment ("Att")

cc:

Jose Ramon Gonzalez-Magaz, Esq. (by e-mail to jrgonzalez@steptoe.com)
Chong S. Park, Esq. (by e-mail to cpark@steptoe.com)
Todd Kossow, Esq. (by e-mail to tkossow@ftc.gov)
Karen Dodge, Esq. (by e-mail to kdodge@ftc.gov)
Leslie Rice Melman (by e-mail to lmelman@ftc.gov)

Your August 7 letter states that Western Union will require at least a month to extract e-mail for 32 custodians. Thus, the rate of extraction is approximately one custodian per day. This letter identifies 74 custodians whose e-mails and documents are to be searched. 74 days from the date of this letter is October 21, 2013. Given the history of this matter and the information you have provided, October 31, 2013 is therefore a reasonable date for the FTC to expect full and complete compliance.

## Protocol for Search and Production of Documents Responsive to Specification 2

#### I. Conduct of searches

As explained below, Western Union should not limit its electronic searches to emails. It must also include all other electronic documents.

In addition, to the extent that Western Union is aware of documents that are responsive to CID Specification 2 but that somehow fall outside of this search protocol, Western Union is obligated to produce those documents, consistent with Judge Hellerstein's finding at the May 28, 2013 hearing that the search terms "will not limit what is relevant." (Tr. at 26.)

### II. Records reflecting direct communications between the Monitor and Western Union

#### A. The Monitor and his team members

Western Union's obligation to search for responsive materials extends beyond its "email journaling system." It must also locate any other electronic documents in its records, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive. This includes any non-identical drafts of any such documents.

With respect to Western Union's electronic searches for communications with the Monitor or members of the Monitor's team, its searches should include the following individuals, email addresses associated with these individuals, and other email addresses:

### Western Union's proposal:

- 1. Lonnie Keene
- 2. Ted Greenberg
- 3. Dennis Lormel
- 4. Wyn Clark
- 5. Paul Lewis
- 6. Lisa Dawson
- John Knapp
- 8. John Bell
- 9. Douglas Meadows
- 10. WUmonitor@gmail.com

#### FTC's additions (with one modification – in bold below):

- 11. Reynold Benjamin
- 12. Rachele Byrne
- 13. Ricki Conrey
- 14. Matt Derstine
- 15. John DeWulf
- 16. Steven Escaravage

- 17. JD Hannick
- 18. Jeff Hunter
- 19. Frederick R. Kessler
- 20. Michael Ledley
- 21. Patrick Mahon
- 22. Nick Nahas
- 23. Sarah Schuyler
- 24. Robert Silbering
- 25. Ernest Sohn
- 26. Email addresses ending in @WUmonitor.com
- 27. WUmonitor2012@gmail.com

## III. Records referring or relating to communications with the Monitor

### A. Western Union custodians to be searched

Again, Western Union may not limit its searches to its "email journaling system," but must instead search all electronic documents, including, but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive.

## Western Union's proposal (as revised by the July 22, 2013 letter):

- 1. Richard Krollman
- 2. Blaine Newby
- 3. Joe Cachev
- 4. Jeannie Larsen
- 5. Alma Angotti
- 6. Hollis Baugh
- 7. Luis Alvarez
- 8. Troy Deering
- 9. Barry Koch
- 10. Cherie Axelrod
- 11. Nicole Ayres
- 12. Janet Baughman
- 13. Mike Bingham
- 14. Tarcisio Bortoletto (or Borteletto)
- 15. Noel Brandt
- 16. Phillip Carratala
- 17. Kathy Desmond
- 18. Eric Dieffenbach
- 19. Robert Enzaldo
- 20. Rosmary Gallagher
- 21. Bryant Gofstein
- 22. Alec Hall
- 23. David Holcomb

- 24. Phil Hopkins
- 25. Niren Kinikar
- 26. Claudia Maldonado
- 27. Becky Mayfield
- 28. Ryan McLaughlin
- 29. Steve Nasalroad
- 30. Linda Porter
- 31. Kristin Pullar
- 32. Valerie Towery

### FTC's revised additions:

- 33. Diego Alvarez
- 34. Johann Arias
- 35. Ann Barrett
- 36. Michele Bixel
- 37. Fabrice Borsello
- 38. Kathleen Butler
- 39. Bob Cambron
- 40. Andrea Castle
- 41. Erik Cheung
- 42. Wilson Davis
- 43. John Dick
- 44. Patrick Driver
- 45. John Dye
- 46. Susan Eberly
- 47. David Fallek
- 48. Silvia Francos (or Fancos)
- 49. Krista Griffith
- 50. Joe Haughton
- 51. Mary Margaret Henke
- 52. Rosa Iglesias
- 53. Niall Kearney
- 54. Victoria Lopez-Negrete
- 55. James Middleton
- 56. Roberto Ochoa
- 57. Jean Lewis Pederson
- 58. Mark Porter
- 59. Heather Shull
- 60. Stewart Stockdale
- 61. Valdis Undiks
- 62. All present and former members of Western Union's management team during the time period covered by the CID, including:
  - a. Hikmet Ersek
  - b. Raj Agrawal
  - c. Odilon Almeida
  - d. John R. Dye (included above)

- e. Jean Claude Farah
- f. Khalid Fellahi
- g. Robin Heller
- h. Jan Hillered
- i. Victoria López-Negrete (included above)
- j. Scott T. Scheirman
- k. Diane Scott
- l. John David Thompson
- m. Drina Yue
- n. Luella Chavez D'Angelo
- o. Richard William

When searching for any of the foregoing names, Western Union should search for variations (including, if applicable, nicknames) of those names. In other words, it should not limit its searches to perfect matches.

Consistent with the June 7, 2013 Order, the FTC reserves its right to identify additional custodians for targeted searches.

#### B. Base search terms

Again, Western Union must search all electronic documents, and not just its "email journaling system," including but not limited to, any emails, memoranda, correspondence, spreadsheets, charts, diagrams, power points, documents shared with the Monitor, and documents from any shared drive accessible to the Monitor, including documents on the Accelion shared drive.

In addition to searching the subject line and body of emails, Western Union must also search the content of any other electronic documents for any of the following terms:

## Western Union's proposal:

- 1. "the Monitor"
- 2. "SWB Monitor"
- 3. "Monitorship"
- 4. "Lonnie"
- 5. "Keene"
- 6. "Ted"
- 7. "Greenberg"

#### FTC's revised additions:

- 8. "Monitor"
- 9. "SWBA Monitor"
- 10. Any reference to any of the Monitor's team listed in Section II.A. above

The FTC reserves its right to provide Western Union with additional base search terms after reviewing Western Union's production.

### C. Limiting terms

Western Union should expand its searches to the following limiting terms:

## Western Union's proposal (with the modification of w/10):

- 1. w/10 tell
- 2. w/10 say\*
- 3. w/10 said
- 4. w/10 told
- 5. w/10 respon\*
- 6. w/10 request\*
- 7. w/10 demand\*
- 8. w/10 ask\*
- 9. w/10 wrote
- 10. w/10 writ\*

### FTC's revised additions (which should not be case sensitive):

- 11. w/10 recommend\*
- 12. w/10 state\*
- 13. w/10 talk\*
- 14. w/10 spoke\*
- 15. w/10 call\*
- 16. w/10 email\*
- 17. w/10 e-mail\*
- 18. w/10 review
- 19. w/10 report\*
- 20. w/10 evaluat\*
- 21. w/10 plan
- 22. w/10 request\*
- 23. w/10 propos\*
- 24. and Implementation Plan
- 25. and Periodic Review\*
- 26. and MIP\*
- 27. and Recommendation\*
- 28. and 5%
- 29. and 5 %
- 30. and 5 percent
- 31. and 5 per cent
- 32. and five percent
- 33. and five per cent
- 34. and risk assessment\*
- 35. and KYA
- 36. and know your agent
- 37. and agent oversight
- 38. and interdict\*

12/09/2013 12:37 FAX 位 0018/0021

- 39. and WUBS
- 40. and Western Union Business Solutions
- 41. and WU Business Solutions
- 42. and Business Solutions
- 43. and Travelex
- 44. and Custom House
- 45. and prepaid
- 46. and pre-paid
- 47. and money order

The FTC reserves its right to provide Western Union with additional limiting terms after reviewing Western Union's production.

## IV. Conduct of searches for hard copy documents

Western Union must search the hard copy documents of all of the individuals listed in section III.A. above for documents that are responsive to CID Specification 2.

**EXHIBIL B** 

12/09/2013 12:37 FAX

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**Round 1 Production Schedule** 

Name	Production Date
Bixel, Michelle M	11/18/2013
Borsello, Fabrice	11/22/2013
Cambron, Robert	11/18/2013
. Chung, Erik #1	11/18/2013
Chung, Erik #2	11/22/2013
Francos Saenz, Silvia	11/22/2013
Krollman, Richard H	11/27/2013
Alvarez, Luis M	12/13/2013
Axelrod, Cherie Z	12/13/2013
Ayres, Nicole M	12/13/2013
Barrett, Ann M	12/13/2013
Baugh II, Hollis A	12/13/2013
Baughman, Janet L	12/13/2013
Bingham, Mike A	12/13/2013
Bortoletto, Tarcisio	12/13/2013
Brandt, Noel G	12/13/2013
Butler, Kathleen M	12/13/2013
Cachey III, Joseph	12/13/2013
Carratala, Phillip	12/13/2013
Deering, Troy A	12/13/2013
Desmond, Katherine A	12/13/2013
Dieffenbach, Eric H	1/8/2014
Enzaldo, Robert A	1/8/2014
Ersek, Hikmet	1/8/2014
Farah, Jean-Claude	1/8/2014
Griffith, Krista A	1/8/2014
Hall, Richard Alec	1/8/2014
Haughton, Joseph M	1/8/2014
Henke, Mary-Margaret	1/8/2014
Holcomb, David D	1/8/2014
Hopkins, (Douglas) Phil	1/8/2014
Koch, Barry Mitchell	1/8/2014
Mayfield, Rebecca L	1/8/2014
Ochoa-Ramirez, Roberto	1/8/2014
Porter, Mark J	1/8/2014
Agrawal, Rajesh K	1/8/2014
Almeida, Odilon	1/8/2014
Angotti, Alma	1/8/2014
Castle, Andrea	1/8/2014
D'Angelo, Luella Chavez	1/8/2014
Davis, Edward	1/8/2014
Dick, John R	1/8/2014
Driver, James P	1/8/2014

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Round 1 Production Schedule	
Name	Production Date
Eberly, Susan L	1/8/2014
Fellahi, Khalid	1/8/2014
Gofstein, Bryant T	1/8/2014
Heller, Robin S	1/8/2014
Hillered, Jan	1/8/2014
Larsen, Jeanne M	1/8/2014
Lopez Negrete, Victoria	1/8/2014
Maldonado, Claudia	1/8/2014
McLaughlin,Ryan	1/8/2014
Nasalroad, Steven J	1/8/2014
Newby, Blaine L	1/8/2014
Pederson, (Laura) Jean Lewis	1/8/2014
Pullar, Kristin N	1/8/2014
Scheirman, Scott T	1/8/2014
Scott, Diane M	1/8/2014
Stockdale, Stewart A	1/8/2014
Thompson, John David	1/15/2014
Towery, Valerie Y	1/15/2014
Williams, Richard L	1/15/2014
Yue, C Drina	1/15/2014
Alvarez Badilla, Luis Diego	1/15/2014
Arias Chaves, Johann	1/15/2014
Iglesias Gonzalez, Rosa	1/15/2014
Kearney Sr, Niall P	1/15/2014
Kinikar, Niren	1/15/2014
Middleton, James	1/15/2014
Porter, Linda K	1/15/2014
Undiks, Valdis I	1/15/2014
Dye, John R	1/15/2014
Fallek, David H	1/15/2014
Gallagher, Rosemary T	1/15/2014
Shull, Heather Johnson	1/15/2014