


between 2010 and 2016 IF the deposition transcripts addressed in (1), (2) and (3) above are not of any of the members of the Tire Durability Team and/or do not discuss Cooper's knowledge, if any, regarding the cause and prevention of tread separations in tires that involve the same Green Tire Specifications (GTS) as the Subject Tire or Similar Tires (defined in this Order as tires built to the same GTS as the Subject Tire and tires built to any related specification) or the availability, efficacy and cost of incorporating Belt Edge Gum Strips (BEGS) and nylon cap plies in tires that involve the same Green Tire Specifications as the Subject Tire or Similar Tires (defined in this Order as tires built to the same GTS as the Subject Tire and tires built to any related specification).

It is further ORDERED that the depositions of former and current Cooper employees produced by Cooper pursuant to this Order are produced under the protection of the Protective Order entered in this case and all terms and conditions of this Court's Protective Order shall govern the use, disclosure, dissemination, and return of such depositions.

It is further ORDERED that Plaintiff shall not depose any former Cooper employee whose deposition is provided pursuant to this Order unless leave of Court is granted.

It is further ORDERED that Defendant Cooper Tire & Rubber Company shall produce these transcripts to Plaintiff within 14 days of the signing of this Order.

Signed this 10th day of March, 2016.



Caroline Baker,
Judge Presiding