

# **Exhibit E**

**Schaeffer, Scott**

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**From:** Antalics, Michael E.  
**Sent:** Wednesday, August 26, 2015 9:01 AM  
**To:** Michael R. Shumaker  
**Subject:** RE: proposal

Mike,

Thanks for your reply. Let me check with the client on that.

Mike

**From:** Michael R. Shumaker [<mailto:mrshumaker@JonesDay.com>]  
**Sent:** Wednesday, August 26, 2015 8:49 AM  
**To:** Antalics, Michael E.  
**Subject:** RE: proposal

Mike,

The one big bucket that this misses is strategic plans, business plans, competition analyses, etc. As previously discussed, those documents are of considerable relevance here. Can you provide any proposal on that front?

Mike

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----- Message from "Antalics, Michael E." <[mantalics@omm.com](mailto:mantalics@omm.com)> on Wed, 26 Aug 2015 01:25:41 GMT -----

**From:** "Antalics, Michael E." <[mantalics@omm.com](mailto:mantalics@omm.com)>  
**To:** "[mrshumaker@JonesDay.com](mailto:mrshumaker@JonesDay.com)"  
**Subject:** Re: proposal

Sure. Send me an email if you can to give me a heads up on when you're about ready to call so I make sure I'll be available.

Mike

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**From:** Michael R. Shumaker [<mailto:mrshumaker@JonesDay.com>]  
**Sent:** Tuesday, August 25, 2015 06:21 PM Pacific Standard Time  
**To:** Antalics, Michael E.  
**Subject:** Re: proposal

Mike:

I am on the road and tied up in the morning, but should free up around noon. If you don't mind some airport noise in the background, I'll give you a call from there.

Mike

Michael R. Shumaker ([bio](#))  
Partner  
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From: "Antalics, Michael E." <[mantalics@omm.com](mailto:mantalics@omm.com)>  
To: "[mrshumaker@jonesday.com](mailto:mrshumaker@jonesday.com)" <[mrshumaker@jonesday.com](mailto:mrshumaker@jonesday.com)>,  
Date: 08/25/2015 07:16 PM  
Subject: proposal

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Mike,

I tried to get you on the phone to give you a heads up on this. Please give me a call in the morning.

If Electrolux agrees to appropriate limitations on the subpoena to conform to the following proposal, SEA will agree to produce the following non-privileged SEA documents that it is reasonably able to locate related to the products on which DOJ based its complaint:

1. An update on the (a) invoicing and returns data provided to DOJ since the production to DOJ; (b) profit and loss data provided to DOJ since the production to DOJ; and (c) the MAP/MSRP data provided to DOJ since the production to DOJ. SEA made a comprehensive data production in response to the DOJ's CID. The production reflects information that is reasonably accessible to SEA. Older data is either archived or no longer available.
2. SEA's contract channel bids for the last two years.
3. Meeting competition documents for the last two years if they are found in a meeting competition database.
4. Documents sufficient to identify SEA's products.
5. Contracts with SEA's top ten customers for the past two years (subject to contractual notice requirements).
6. SEA's current organizational chart for the products at issue.
7. Trade show panel presentations from the last two years, if any.
8. Contract manufacturing contracts, if any, from the last two years.
9. Documents sufficient to identify the location of SEA facilities.
10. A list of SEA's servicers.

11. Contracts with SEA's top ten servicers (subject to contractual notice requirements).

We also would like to discuss some additional categories of documents with you. What is a good time for you?

Thanks.

Mike

**Michael E. Antalics**  
**O'Melveny & Myers LLP**  
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