

# **EXHIBIT 1**

**From:** [Lazarus, Gabriel](#)  
**To:** [Huppert, Matthew \(ATR\)](#)  
**Cc:** [Isaacs, Miranda \(ATR\)](#); [Owen, Jay \(ATR\)](#); [Melinda R. Coolidge](#); [Gelfand, David I.](#); [Justin.bernick@hoganlovells.com](#); [Battaglia, Lauren E.](#)  
**Subject:** [EXTERNAL] RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement  
**Date:** Tuesday, September 26, 2023 12:12:52 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Matt and colleagues,

Melinda and I spoke this morning. ASSA ABLOY is agreed with the modifications to the trustee team list that Melinda shared last week.

Regarding future adverse representations, after the conversation with Jay and Miranda last week, we had been thinking about a case-by-case approach where ASSA ABLOY would consent to adverse representations, and the court would have the last word if there's a dispute. Melinda raised concerns that approach may entail disclosure of other clients' confidential information to ASSA ABLOY, and sees the proposal involving the DOJ as a way around that issue.

It would be helpful to get a better understanding from the DOJ about how it would evaluate adverse representations if they come up. Is that something you could provide? Happy to find a time for a call if that's best.

Regards,

Gabriel

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**Gabriel J. Lazarus**

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**From:** Huppert, Matthew (ATR) <Matthew.Huppert@usdoj.gov>  
**Sent:** Monday, September 25, 2023 17:24  
**To:** Lazarus, Gabriel <glazarus@cgsh.com>  
**Cc:** Isaacs, Miranda (ATR) <Miranda.Isaacs@usdoj.gov>; Owen, Jay (ATR) <Jay.Owen@usdoj.gov>; Melinda R. Coolidge <mcoolidge@hausfeld.com>; Gelfand, David I. <dgelfand@cgsh.com>; Justin.bernick@hoganlovells.com; Battaglia, Lauren E. <lauren.battaglia@hoganlovells.com>; Cohen-Millstein, Peter <peter.cohen-millstein@hoganlovells.com>  
**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Gabriel,

We'd like to know whether any of the additional information that's been provided

and/or the further changes that have been proposed since our September 20 call have resolved any of the disputed issues concerning the monitoring trustee's engagement. We'd appreciate if you could provide ASSA ABLOY's position on these matters by the close of business tomorrow, September 26. As previously discussed, time is of the essence in resolving outstanding disputes about this engagement.

Thanks,

Matt

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**Matthew R. Huppert** (he/him)  
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**From:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Sent:** Friday, September 22, 2023 5:34 PM  
**To:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>  
**Cc:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>; Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>  
**Subject:** [EXTERNAL] RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Melinda,

Thank you—we will review this proposal with ASSA ABLOY as well and provide an update once we've discussed on our side.

Best,

Gabriel

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**Gabriel J. Lazarus**  
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**Cc:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>

**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

All,

I have been thinking about how to bridge our final gap and brainstorming with folks on my side. As we have all agreed, the final concept remains a purely theoretical one – and one that will likely never come to pass – so it would be unfortunate if we were unable to find common ground. I have heard concerns about information leakage, which I think are addressed by the protective order and firewalls, and are commonplace to all our firms. I think we have cleared up what does and does not constitute an actual conflict, and we all share the goal of ensuring that the monitorship is not compromised.

Considering all of this, I propose to add a further restriction on the monitoring team. In addition to agreeing that the monitoring team not be adverse to ASSA ABLOY in any matter, and agreeing that Hausfeld and Stoneturn not be adverse to ASSA ABLOY (1) for any work substantially related to the monitorship, and (2) agreeing to firewall off the monitoring team, I propose that prior to taking any such representation, we (3) be required to obtain clearance from the Department of Justice under its normal practice of evaluating such issues for monitoring trustees. If the Department of Justice identifies any concerns, we will not undertake the representation. You can review the attached for my proposed language, as well as that for Bates White.

I hope that this will allow us to move on with our work ahead.

Best regards,

---

**MELINDA R. COOLIDGE**

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**From:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>

**Sent:** Thursday, September 21, 2023 7:37 PM

**To:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>; Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-

Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>

**Cc:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>

**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Melinda,

Thank you—we will review with ASSA ABLOY and get back to you as soon as we can.

Best,

Gabriel

---

**Gabriel J. Lazarus**

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**From:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>

**Sent:** Thursday, September 21, 2023 19:34

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**Cc:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>

**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

All,

Following our call yesterday, in an effort to facilitate moving forward with agreeing on the retention terms, I will agree to **remove** the following individuals from the latest draft of Exhibit D at the time of our retention:

Firm	Timekeeper Name	Timekeeper Rank
Hausfeld	Walter Kelley	Partner
Hausfeld	Scott Martin	Partner
Hausfeld	Brian Ratner	Partner
Hausfeld	Emma Blake	Associate
Hausfeld	James Mitchell	Paralegal
Hausfeld	Hazel Berkoh	Paralegal
StoneTurn	Jack Aerni	Senior Consultant
StoneTurn	Christina Doherty	Senior Consultant

As discussed, I will provide written notice of the hiring and the rate of compensation to ASSA and DOJ within three business days of hiring any additional agents or consultants not currently included in Exhibit D, as outlined in Section X.F., that are reasonably necessary in my judgment to assist with my duties, as described in Section X.E.

In addition, I thought it would be helpful to provide an overview of our workstream structure and the types of activities for which the personnel that remain on Exhibit D will be responsible.

Based on a very preliminary assessment, which will naturally be refined once we meet with ASSA and begin reviewing documentation to better understand what ASSA has done to comply with the terms of the Stipulation and Order and Final Judgment to date, I anticipate organizing the team members into workstreams as follows:

#### Task 1

The workstreams/sub-workstreams associated with Task 1 will be responsible for assessing ASSA's compliance with their obligations under the terms of the SO and FJ. In addition to me, the main personnel working I expect to be responsible are as follows:

<b>Firm</b>	<b>Timekeeper Name</b>	<b>Timekeeper Rank</b>
Hausfeld	Camila Ringeling	Associate
StoneTurn	Michele Edwards	Partner
StoneTurn	Jason Liew	Partner
StoneTurn	Lisa Van Houten	Managing Director
StoneTurn	Dana Ball	Managing Director
StoneTurn	Lauren Nowakowski	Manager
StoneTurn	Erica Levy	Senior Consultant
StoneTurn	Thanh Nguyen	Senior Consultant
StoneTurn	Tate Dixon	Consultant

I expect that these individuals will be responsible for the following main tasks:

- Assessment and testing of compliance of obligations under the Asset Preservation Stipulation and Order related to the operation, preservation and maintenance of the Premium Mechanical and Smart Lock divestiture assets (Lisa, Erica)
- Assessment and testing of ASSA ABLOY's divestiture of the Premium Mechanical and Smart Lock Divestiture Assets (Lisa, Lauren, Erica)
- Assessment and testing of compliance with obligations related to the identification and hiring of Premium Mechanical and Smart Lock Divestiture relevant personnel (Dana, Tate)
- Assessment and testing of compliance with obligations, including ASSA ABLOY's ongoing efforts to assist Fortune Brands in assigning or otherwise transferring all contracts, agreements, and customer relationships included in the Premium Mechanical and Smart Lock Divestiture Assets (Dana, Tate)
- Assessment and testing of compliance with obligations, including ASSA ABLOY's

- warranties related to the operational condition of divestiture assets (Dana, Tate)
- Assessment and testing of compliance with obligations, including ASSA ABLOY's ongoing efforts to assist Fortune Brands in obtaining all necessary licenses, registrations, and permits to operate the Premium Mechanical and Smart Lock Divestiture Businesses (Lauren, Erica)
- Assessment and testing of compliance with obligations, including ASSA ABLOY's ongoing efforts to assist Fortune Brands in entering into supply contract(s) for all products necessary to operate the Premium Mechanical and Smart Lock Divestiture Businesses (Lisa, Lauren)
- Assessment and testing of compliance with obligations, including ASSA ABLOY's ongoing efforts to assist Fortune Brands in providing transition services to cover all services necessary to operate the Premium Mechanical and Smart Lock Divestiture Businesses including services for back office, human resources, accounting, employee health and safety, and information technology services and support (Lisa, Lauren)
- Assessment, on-site visits and testing related to all services necessary to operate the manufacturing facility at Lot A10, Ba Thien II IP, Thien Ke, Binh Xuyen, Vinh Phuc, Vietnam (Jason, Thanh)
- Assessment and testing of compliance with obligations and monitoring of the Yale brand name transition and wind-down (Lauren, Erica)
- Assessment and testing of compliance with obligations and monitoring of the Yale access control system (Lauren, Erica)
- Assessment and testing of compliance with obligations and monitoring of patents (Lisa)

Camila and I will oversee all of the above.

## Task 2

The workstream associated with Task 2 will be responsible for monitoring changes to competitive intensity as outlined in the Additional Relief section of the FJ. In addition to me, the main personnel working I expect to be responsible are as follows:

<b>Firm</b>	<b>Timekeeper Name</b>	<b>Timekeeper Rank</b>
Hausfeld	Daniel Weick	Counsel
Hausfeld	Jane Shin	Associate
Bates White	Scott Lobel	Partner
Bates White	Steven Schulenberg	Partner
Bates White	Slava Zayats	Partner

Dr. Steve Schulenberg, an economist, will apply his experience in economic analysis of complex competition issues to design and implement a study that measures changes in competitive intensity in the residential Smart Locks business over time. Scott Lobel, a certified public accountant, will advise on the metrics of that study, including components of financial analysis and causation for changes to competitive intensity. Dr. Slava Zayats, an economist who has served as an expert in numerous merger matters, will advise on merger specific issues related to the study of competitive intensity. The work done by Bates White professionals will be complementary, not duplicative.

## Engagement Management and Reporting

Both tasks will be supported by me and various other Partner, Managing Director and Associates included above who will be responsible for

managing drafting reports and communicating progress and findings to the DOJ and where appropriate, ASSA.

### Administration

Finally, both tasks will be supported by paralegals or paraprofessionals who will be responsible for administrative activities, such as collecting, tracking, organizing and storing documentation received from ASSA for the Monitoring Trustee team so they can access the documentation relevant to their workstream, establishing technology platforms to store documentation and Monitoring Trustee team work product and other administrative duties. At this time, this includes the following personnel:

Firm	Timekeeper Name	Timekeeper Rank
Hausfeld	Elliot Robinson	Paralegal
StoneTurn	Belvon Luk	Paraprofessional

I am attaching what I hope will be a final draft of the engagement letter, with these changes reflected.

Kind regards,  
Melinda

#### MELINDA R. COOLIDGE

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**From:** Lazarus, Gabriel <[gglazarus@cgsh.com](mailto:gglazarus@cgsh.com)>  
**Sent:** Wednesday, September 20, 2023 10:31 AM  
**To:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>; Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>



**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Matt,

ASSA ABLOY can do 5pm as well.

Separately, the chart below sets out positions on the outstanding items. I understand Melinda agrees it's an accurate summary.

Best,

Gabriel

Issue	Trustee	ASSA ABLOY
<p><b>Representations Adverse to ASSA ABLOY</b></p>	<p>Hausfeld and StoneTurn may engage in adverse representations during the monitorship as long as individual trustee team members are firewalled and the matter isn't substantially related to the Monitorship.</p> <p>Bates White may engage in adverse representations for the duration of the monitorship without any restriction on the subject of the representation, as long as trustee team members are not involved, and subject to typical restrictions on data access and discussing confidential information outside of teams.</p>	<p>None of the trustee firms will engage in adverse representations during the monitorship.</p>
<p><b>Exhibit D/Budget</b></p>	<p>Exhibit D lists individuals who the Trustee currently expects to consult, have complete occasional assignments, or serve as backup, and cannot be cut down (apart from the caps noted in the Exhibit).</p> <p>It is not feasible to estimate a budget at the outset as the Trustee does not have complete information about what work will be required. It may (or may not) be feasible to draft a budget around the beginning of next year, once the Trustee reviews the record and gathers</p>	<p>The list of 25 individuals in Exhibit D (with caps) is excessive for the immediate, known needs of the Monitorship. Exhibit D should include only individuals necessary at this point. The engagement letter sets out a process to add team members if and when necessary later on.</p> <p>The Trustee should be able to provide periodic budgets estimating Monitorship costs from "day 1."</p>

more information.

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**From:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>  
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**To:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>; Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
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**Subject:** Re: United States v. ASSA ABLOY - Monitoring Trustee Engagement

2:30 doesn't work for DOJ. By process of elimination, does 5 pm work for everyone?

---

**From:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>  
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**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com) <[Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com)>; Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** [EXTERNAL] RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

I can.

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**From:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Sent:** Wednesday, September 20, 2023 9:44 AM  
**To:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

All,

With apologies for the switch—could we possibly do 2:30 instead?

Thank you,

Gabriel

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**Gabriel J. Lazarus**

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**From:** Lazarus, Gabriel  
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**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Matt,

2pm works for ASSA ABLOY.

Gabriel

---

**Gabriel J. Lazarus**

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**From:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>  
**Sent:** Wednesday, September 20, 2023 09:39  
**To:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>; Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** Re: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Could we all do 2 pm?

---

**From:** Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>  
**Sent:** Wednesday, September 20, 2023 9:35:23 AM  
**To:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com) <[Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com)>; Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** [EXTERNAL] RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

I'm sorry, I can move anything in my day except my meeting from 11:00-1:00. I'm available any other time.

---

**MELINDA R. COOLIDGE**

US Managing Partner  
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**From:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>  
**Sent:** Wednesday, September 20, 2023 8:26 AM  
**To:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; Melinda R. Coolidge <[mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)>; Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Thanks, Gabriel.

To both Melinda and ASSA: Before the call, please send us an email concisely describing the disputed issues, as you understand them, and your rationale(s) for maintaining the position you're taking as to each. This will help us use our half hour most efficiently.

---

**Matthew R. Huppert** (he/him)  
U.S. DEPARTMENT OF JUSTICE | ANTITRUST DIVISION  
450 FIFTH STREET, NW, SUITE 8700  
WASHINGTON, DC 20001  
(202) 476-0383 (CELL)

---

**From:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Sent:** Wednesday, September 20, 2023 8:01 AM  
**To:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>  
**Cc:** Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; [mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com); Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** [EXTERNAL] Re: United States v. ASSA ABLOY - Monitoring Trustee Engagement

Matt,

Yes, 12:30 is good on our end. We have a hard stop at 1:00 but we think a half hour will work.

Best,

Gabriel

---

**Gabriel J. Lazarus**

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Washington, DC 20037  
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Pronouns: he/him/his

On Sep 20, 2023, at 06:38, Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)> wrote:

Thanks, Gabriel. Could we try for 12:30? Melinda, would that time work for you?

---

**Matthew R. Huppert** (he/him)  
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---

**From:** Lazarus, Gabriel <[glazarus@cgsh.com](mailto:glazarus@cgsh.com)>  
**Sent:** Tuesday, September 19, 2023 8:18 PM  
**To:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>; Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E. <[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; [mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)  
**Cc:** Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>  
**Subject:** [EXTERNAL] RE: United States v. ASSA ABLOY - Monitoring Trustee Engagement

All,

The ASSA ABLOY side is available 11:30am-1pm, 2-3:45pm, or 5-5:30pm.

Regards,

Gabriel

---

**Gabriel J. Lazarus**  
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T: +1 202 974 1812 | M: +1 301 915 7048  
[glazarus@cgsh.com](mailto:glazarus@cgsh.com) | [clearygottlieb.com](http://clearygottlieb.com)  
Pronouns: he/him/his

---

**From:** Huppert, Matthew (ATR) <[Matthew.Huppert@usdoj.gov](mailto:Matthew.Huppert@usdoj.gov)>

**Sent:** Tuesday, September 19, 2023 19:03

**To:** Lazarus, Gabriel <[gglazarus@cgsh.com](mailto:gglazarus@cgsh.com)>; Gelfand, David I. <[dgelfand@cgsh.com](mailto:dgelfand@cgsh.com)>; [Justin.bernick@hoganlovells.com](mailto:Justin.bernick@hoganlovells.com); Battaglia, Lauren E.

<[lauren.battaglia@hoganlovells.com](mailto:lauren.battaglia@hoganlovells.com)>; Cohen-Millstein, Peter <[peter.cohen-millstein@hoganlovells.com](mailto:peter.cohen-millstein@hoganlovells.com)>; [mcoolidge@hausfeld.com](mailto:mcoolidge@hausfeld.com)

**Cc:** Isaacs, Miranda (ATR) <[Miranda.Isaacs@usdoj.gov](mailto:Miranda.Isaacs@usdoj.gov)>; Owen, Jay (ATR) <[Jay.Owen@usdoj.gov](mailto:Jay.Owen@usdoj.gov)>

**Subject:** United States v. ASSA ABLOY - Monitoring Trustee Engagement

**Importance:** High

All,

It's come to our attention that, despite extensive discussions over the course of several weeks, you have been unable to reach agreement on the terms of Melinda's engagement as the monitoring trustee. Because your discussions have gone well past the 14 days of negotiation contemplated in Section X(F) of the Final Judgment, we'd like to convene a call as soon as possible among ASSA, Melinda, and DOJ personnel to make sure we fully understand the nature of the outstanding items and to discuss appropriate next steps. Given the time that has already elapsed, we consider this a time-sensitive matter that requires everyone's prompt attention. Therefore, please let us know your availability for a call tomorrow, September 20.

Thanks,

Matt

---

**Matthew R. Huppert** (he/him)

U.S. DEPARTMENT OF JUSTICE | ANTITRUST DIVISION  
450 FIFTH STREET, NW, SUITE 8700  
WASHINGTON, DC 20001  
(202) 476-0383 (CELL)

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