

common interest privilege has limited inquiry into relevant factual issues, as shown in the assertion of the privilege by Governor Richard Snyder in his October 9 deposition as more fully set forth in the motion.

2. In light of the expedited nature of the proceedings with respect to the debtor's eligibility to file for Chapter 9 protection and the imminent trial date, this Court should grant UAW's request for an expedited hearing to resolve the privilege issues that have arisen to date. It is critical that the privilege issues be resolved now to ensure that all relevant discovery is produced.

3. This Court twice recognized the exigency with which discovery disputes raised in connection with the City's eligibility to file for chapter 9 relief must be resolved through its orders for expedited hearings to consider the State's Motion to Quash certain of UAW's discovery requests [Docket No. 703] and UAW's Objections and Comments to the Court's August 26, 2013 Order Regarding Eligibility Objections, Notices of Hearing and Certifications [Docket No. 759]. For the same reasons that compelled this Court to grant expedited consideration of the proceeding discovery disputes, the instant dispute should be addressed with the same urgency.

4. Accordingly, UAW respectfully requests that this Court expedite consideration of the Motion to Compel and schedule a hearing for Monday, October 21, 2013 or such other date as the Court deems appropriate.

WHEREFORE, UAW respectfully requests that this Court: (1) enter an order substantially in the form attached hereto as Exhibit 1, granting the relief sought herein; and (ii) grant such other and further relief to UAW as the Court may deem proper.

Dated: New York, New York
October 17, 2013

Respectfully submitted,

International Union, UAW

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