

EXHIBIT 3

MASTER FILE NO. 2021-15294

IN RE: JANUARY 24 TH	§	IN THE DISTRICT COURT OF
EXPLOSION LITIGATION	§	HARRIS COUNTY TEXAS
This Document Relates to All Cases	§	11 th JUDICIAL DISTRICT

AGREED PRODUCTION SPECIFICATION PROTOCOL

1. These document requests apply to all documents in your possession, custody or control regardless of their location, and regardless of whether such documents are held by your representatives, agents, attorneys, advisors, accountants, family members, or any other person. In searching for any documents responsive to these requests, you should also search all devices or media capable of containing electronic or magnetic data including, without limitation, hard drives of all computers used by any person with knowledge of the facts relevant to this dispute, network servers, back-up and archival storage systems, home computers, laptop computers, voice mail systems, floppy disks, removable data cartridges, and any mobile devices, such as cell phones or tablets.
2. If any copy of any document whose production is sought is not identical to any other copy thereof, by reason of any alterations, different form (*e.g.*, electronic form), metadata or metatags, marginal notes, comments or other material contained thereon, attached thereto, or otherwise, all such non-identical copies shall be produced separately. Such other copies include, without limitation, all revisions in electronic or magnetic format.
3. All Documents. All documents produced must be branded and named with a unique, consistently formatted identifier with an alpha prefix along with a fixed length Bates number (*e.g.*, ABC000000001). This format must remain consistent across all production numbers. The number of digits in the numeric portion of the format should not change in subsequent productions, nor should spaces, hyphens, or other separators be added or deleted. Any document that contains essential color should be produced in color as JPG images. “Essential color” is defined as color that is essential to the understanding of the document, such as the color in charts, maps, graphs, and photographs.
4. Hard Copy Documents. For documents that only exist in hard copy and not electronic form, please produce those documents as Group IV compressed single-page TIFF for black and white images or JPEG for color images named by Bates number. Provide standard LFP and OPT image load files with an image key containing the same image names/Bates numbers as the corresponding images. All TIFF/JPEG images must be branded and named with a unique, consistently formatted identifier with an alpha prefix along with a fixed length (9 numeric digit) Bates number (*e.g.*, ABC000000001). The LFP and OPT load files should accurately reflect logical document breaks. OCR should be provided as document level text files with an LST load file or as a linked path in a delimited text file (a .DATfile).
5. Fielded data for hard copy documents should be provided in a delimited text file with the following delimiters:

- Field separator = | (ASCII character 124) or, (ASCII character 020). If comma delimiter is used, all field text must be bounded by quote character (b) to account for internal commas.
 - Quote character = b (ASCII character 254)
 - Multi-entry delimiter = ; (ASCII character 059)
 - Return value in data = ~ (ASCII character 126)
 - The fielded data should include but not be limited to the following:
 - Beginning Document number
 - Ending Document number
 - Beginning Attachment number
 - Ending Attachment number
 - Page or Image Count
 - Custodian
 - FileType = HARDCOPY (or should otherwise indicate document was scanned from hard copy)
 - Location
 - Production Volume (See below Item 8 for naming convention for field names.)
6. Electronic Documents. Please produce email, attachments, and loose native files as Group IV compressed single-page TIFF for black and white images or JPEG for color images named by Bates number. Provide standard LFP and OPT image load files with an image key containing the same image names/Bates numbers as the corresponding images. All TIFF/JPEG images must be branded and named with a unique, consistently formatted identifier with an alpha prefix along with a fixed length (9 numeric digits) Bates number (e.g., ABC000000001). Extracted text or OCR should be provided as document level text files with an LST load file or as a linked path in a delimited text file (a .DAT file).
7. Additionally, Excel files, spreadsheets, database files, audio files, video files, AutoCAD drawings, or any non-printable or unsupported file types should be produced in their native format with the relative path in the .DAT file. A placeholder image with basic identifying information (File Name and Bates number) should be provided. If counsel requests native files of other specific documents, opposing counsel will comply as long as the request is not overly burdensome or frivolous.
8. Metadata for the emails and attachments should be provided in a delimited text file with the following delimiters:
- Field separator = | (ASCII character 124) or, (ASCII character 020). If comma delimiter is used, all field text must be bounded by quote character (b) to account for internal commas.
 - Quote character = b (ASCII character 254)
 - Multi-entry delimiter = ; (ASCII character 059)
 - Return value in data = ~ (ASCII character 126)

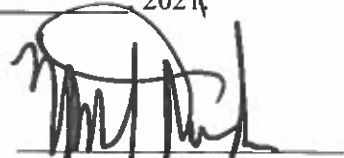
The metadata fields should include, (if available from native files) the following:

- BegDoc
- EndDoc
- BegAttach
- EndAttach
- PageCount
- Volume (indicating production volume number)
- FileType (as recognized by ingestion application: i.e. Adobe Acrobat or PDF, Outlook Email/ Email/ MIME Outlook EML/ MIME/ MSG/Microsoft Outlook Message Mail, Plain Text, MS Excel, AUTOCADDWG, JPEG/JPEG File Interchange, HTML/Internal HTML, TIFF/ Tagged Image, MS Office Word, etc.)
- Family Date (should inherit from parent message)
- Family Time (should inherit from parent message)
- DateSent (MM/DD/YYYY)
- TimeSent (MM/DD/YYYY hh:mm:ss)
- DateRcvd (MM/DD/YYYY)
- Time Rcvd (MM/DD/YYYY hh:mm:ss)
- DateCreated (MM/DD/YYYY)
- TimeCreated (MM/DD/YYYY hh:mm:ss)
- DateLastModified (MM/DD/YYYY)
- TimeLastModified (MM/DD/YYYY hh:mm:ss)
- DateLastAccessed (MM/DD/YYYY)
- TimeLastAccessed (MM/DD/YYYY hh:mm:ss)
- Author
- From
- To
- CC
- BCC
- Subject
- MsgID
- MD5Hash
- SHA1Hash
- FileSize
- FileExtension
- FileName
- Source (Original Folder or Pathway)
- Application
- AttachmentCount
- AttachmentTitles
- File/Doc Type (if different from Media)
- Custodian
- Duplicate Custodian

- ConfidentialDesignation
- NativePath (relative)

9. In the event the volume of loose natives becomes excessively large and thereby exceedingly costly to process, counsel will notify opposing counsel and the parties will consider alternatives to a tiff/jpeg production. All production media and/or zip files must be encrypted and free of any viruses.

Signed on this 7th day of May 2021



Hon. Judge Mark Davidson