

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPLAINT OF CAPITAL ONE SERVICES, INC.

Docket No. C2008-3

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR ADDITIONAL TIME TO
SUPPLEMENT PRIVILEGE LOG ASSOCIATED WITH THE FIRST DAY OF THE
DEPOSITION OF JESSICA DAUER LOWRANCE**
(September 5, 2008)

The United States Postal Service hereby moves for additional time to supplement the privilege log associated with the first day of the deposition of Jessica Dauer Lowrance, pursuant to P.O. Ruling No. C2008-3/12. The Postal Service is today filing its privilege log associated with the “documents not produced at the deposition by Ms. Lowrance based on a claim that the documents are either privileged or exempt from disclosure under 39 U.S.C. 410(c) or 5 U.S.C. 552(b).” P.O. Ruling No. C2008-3/3 at 4.

There are, as Ms. Lowrance testified in her deposition,¹ hundreds of e-mails on her computer that may be related to the issues in this docket, many of which may be privileged or exempt. The Postal Service respectfully requests additional time to supplement its privilege log, as a complete review of Ms. Lowrance’s e-mails will require a significant amount of time in order to segregate privileged and/or exempt e-mails from others, and to provide a detailed privilege log related to those e-mails. The Postal Service endeavors to provide a complete privilege log, with sufficiently detailed descriptions of privileged and/or exempt documents, and a list of all privileges and

¹ Tr. 1/50-51.

exemptions associated with each protected document, but respectfully moves for additional time to complete this task.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Pricing and Product Support

Elizabeth A. Reed

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1135
(202) 268-3179; Fax -6187
September 5, 2008