

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

<b>ANNETTE NAVARRO MCCALL and</b>	)	
<b>NAVARRO PHOTOGRAPHY LLC,</b>	)	
	)	<b>Case No. 1:17-CV-406-TSB</b>
<b>Plaintiffs,</b>	)	
<b>v.</b>	)	<b>Judge Timothy S. Black</b>
	)	
<b>WALMART INC. (f/k/a</b>	)	<b>Magistrate Judge Karen L. Litkovitz</b>
<b>WAL-MART STORES, INC.)</b>	)	
<b>and DOES 1-100,</b>	)	
	)	
<b>Defendants,</b>	)	
<b>and</b>	)	
	)	
<b>THE PROCTER &amp; GAMBLE</b>	)	
<b>COMPANY;</b>	)	
	)	
<b>Defendant and Third-Party Plaintiff,</b>	)	
<b>v.</b>	)	
	)	
<b>LIBBY, PERSZYK, KATHMAN</b>	)	
<b>HOLDINGS INC.,</b>	)	
	)	
<b>Third-Party Defendant.</b>	)	

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**DECLARATION OF DEBBIE WOELFEL  
REGARDING JULY 5, 2019 ORDER (ECF 118)**

1. Pursuant to 28 U.S.C. § 1746, I, Debbie Woelfel, submit the following declaration. I have personal knowledge of the facts herein.
2. I am a Legal Manager in the Litigation Group within the Legal Department at The Procter & Gamble Company (“P&G”) in Cincinnati, Ohio. I have been in this position for three years. Prior to this position, I worked as a Legal Manager in the Brand Equity Department at P&G. I worked in the Brand Equity Department for approximately six years.
3. As Legal Manager I am directed by P&G in-house counsel and any outside counsel engaged by P&G to interview P&G employees and assist with factual discovery.

4. To my knowledge, all non-attorney members of the P&G Legal Department are directed by in-house counsel and any outside counsel engaged by P&G to facilitate the delivery of legal advice and create documents, some of which are made in preparation for specific litigation.

5. During my time as Legal Manager, I have worked on the litigation matter between Annette Navarro and P&G, as identified in the case caption above.

6. Specifically related to this litigation, I worked with outside counsel at Dinsmore & Shohl LLP and in-house counsel at P&G to investigate the factual background supporting P&G's legal defenses and claims against Ms. Navarro.

7. Communications identified in P&G's privilege log that have been provided to the Court for in-camera review contain messages between myself and P&G employees.<sup>1</sup> My communications were all made at the direction of counsel for the purpose of relaying legal advice to P&G employees and creating attorney work product to assist with the defense of P&G in this matter.

8. The work product identified in P&G's privilege log that lists myself as the author were all drafted at the direction of counsel for the purpose of preparing for specific and imminent (or already filed) litigation.

9. To seek legal advice or attorney assistance with work product, employees at P&G can reach out to a specific attorney within the Legal Department, or the employee can reach out to the Legal Department as a whole entity. When a P&G employee reaches out to the Legal Department as whole entity seeking legal advice or assistance with work product, that request is initially evaluated by a non-attorney within the Legal Department at the direction of counsel. The

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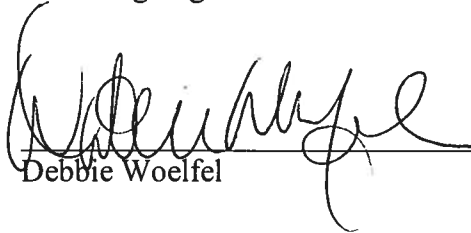
<sup>1</sup> The documents containing relevant communications are attached to this Declaration as Exhibit 1. They are identified by Document ID number.

request is then directed to the attorney that is managing the matter within the Legal Department or the attorney most closely associated with the P&G employee's brand.

10. Documents prepared by the P&G Legal Department may not identify the individual author of the document. However, pursuant to protocols within our Legal Department, all documents created are done so at the direction of in-house counsel and, depending on the contents of the document, often for the purpose of preparing for specific litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 2019

  
Debbie Woelfel

**EXHIBIT ONE TO DECLARATION OF DEBBIE WOELFEL**

F05478-E0014-00203991  
F05478-E0008-00202703  
F05478-E0009-00186427  
F05478-E0007-00040550  
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