

# EXHIBIT 45

WINSTON  
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**Electronic Letterhead**

**BRYNA J. DAHLIN**

Partner

312-558-6362

bdahlin@winston.com

January 3, 2013

**VIA FEDERAL EXPRESS**

Adam R. Fox  
Squire, Sanders & Dempsey (US) LLP  
555 South Flower Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90071


Re: *Western Sugar Cooperative, et al. v*  
*Archer-Daniels-Midland et al*

Dear Counsel:

Subject to the objections and responses contained in The Corn Refiners Association's Responses to Western Sugar's First and Second Requests For Production of Documents, dated May 17, 2012 and July 23, 2012, respectively, enclosed please find a disc containing CRA's initial production in the above captioned matter. The production is Bates stamped CRA 0000001 to CRA 0002708.

Please feel free to contact me with any questions.

Sincerely,



Bryna J. Dahlin

"Enclosure"

cc: Dan Webb  
Steve D'Amore  
Gail Standish  
Neil Murphy

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March 18, 2013

**VIA FEDERAL EXPRESS**

Adam R. Fox  
Squire, Sanders & Dempsey (US) LLP  
555 South Flower Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90071

Re: *Western Sugar Cooperative, et al. v*  
*Archer-Daniels-Midland et al*

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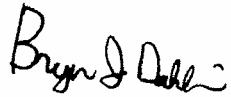
Dear Counsel:

Subject to the objections and responses contained in The Corn Refiners Association's Responses to Western Sugar's First and Second Requests For Production of Documents, dated May 17, 2012 and July 23, 2012, respectively, enclosed please find a disc containing CRA's continuing production in the above captioned matter. The production is Bates stamped CRA 0002709 to CRA 0005732.

Also, we note that this is CRA's second document production in this matter. As of the date of this letter, Plaintiffs have not produced a single document. Please advise when Plaintiffs will begin producing documents.

Please feel free to contact me with any questions.

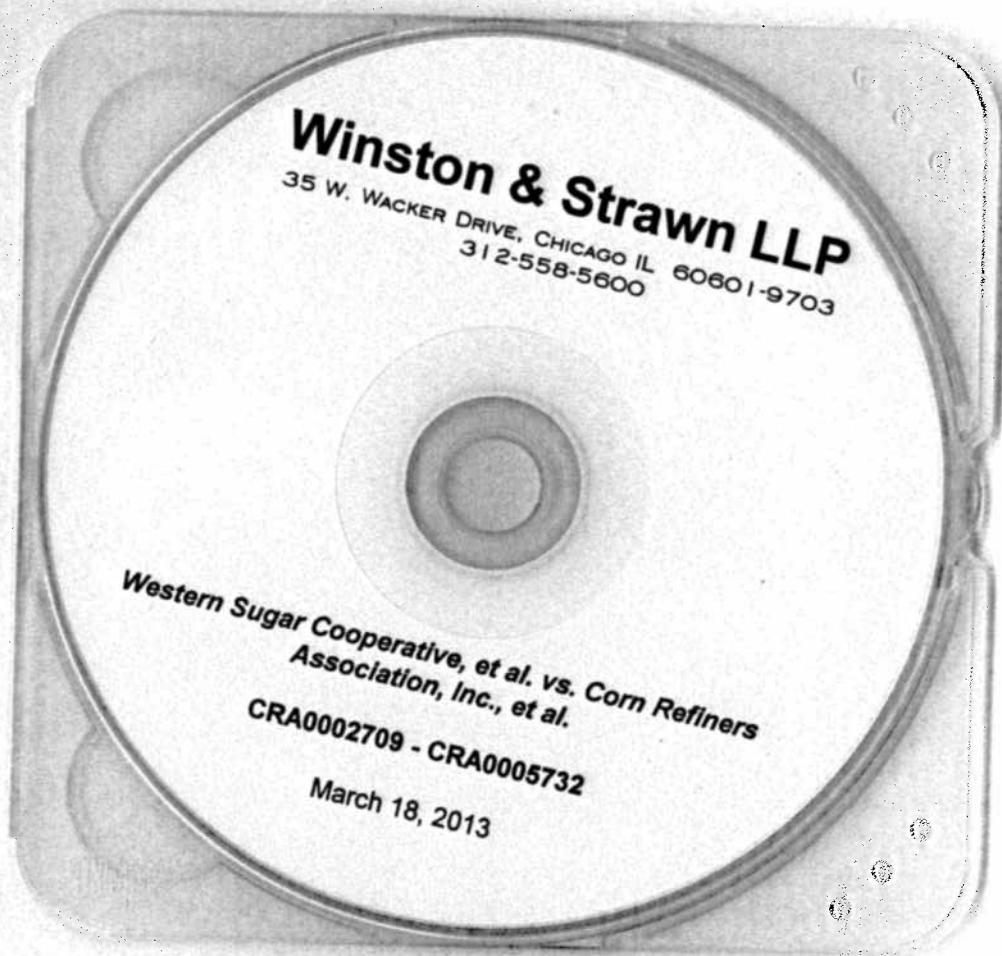
Sincerely,

  
Bryna J. Dahlin /ACS

"Enclosure"

March 18, 2013  
Page 2

cc: Dan Webb  
Steve D'Amore  
Gail Standish  
Neil Murphy



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August 13, 2013

**VIA ELECTRONIC MAIL**

David S. Elkins  
Squire, Sanders & Dempsey (US) LLP  
600 Hansen Way  
Palo Alto, California 94304

Adam R. Fox  
Anne Choi Goodwin  
Squire, Sanders & Dempsey (US) LLP  
555 South Flower Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90071

John A. Burlingame  
Squire, Sanders & Dempsey (US) LLP  
1200 19<sup>th</sup> St., NW Ste. 300  
Washington, DC 20036

Re: *Western Sugar Cooperative, et al. v*  
*Archer-Daniels-Midland et al.*: Defendants'  
Production of Documents

Dear Counsel:

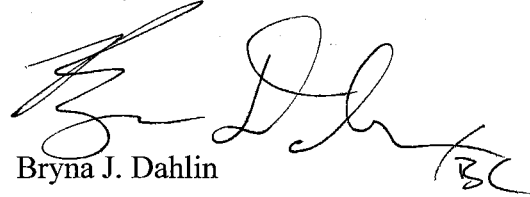
You will receive shortly via e-mail an ftp link to access documents that Defendants are producing in accordance with the parties' meet and confer efforts and pursuant to their respective objections and responses to Plaintiffs' Requests for Production of Documents. The documents being produced today on behalf of CRA have been bates stamped CRA0005733-CRA0096925.

In an effort to produce documents as soon as possible, we anticipate a rolling production of Defendants' documents and expect to make another production next week. To reduce unnecessary expenses for all parties, we have also performed a "global de-duplication" across all custodians such that we are only producing one copy of an email even though multiple custodians may have possessed identical copies.

You may access the ftp link with the same passwords circulated with Defendants' last production on July 25, 2013. Please let us know if you have any questions with the foregoing or any problems accessing the production.

August 13, 2013  
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Bryna J. Dahlin", followed by a stylized flourish or mark that resembles the letters "BC".

Bryna J. Dahlin

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**BRYNA J. DAHLIN**

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August 23, 2013

**VIA ELECTRONIC MAIL**

David S. Elkins  
Squire, Sanders & Dempsey (US) LLP  
600 Hansen Way  
Palo Alto, California 94304

Adam R. Fox  
Anne Choi Goodwin  
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555 South Flower Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90071

John A. Burlingame  
Squire, Sanders & Dempsey (US) LLP  
1200 19<sup>th</sup> St., NW Ste. 300  
Washington, DC 20036

Re: *Western Sugar Cooperative, et al. v*  
*Archer-Daniels-Midland et al.*: Defendants'  
Production of Documents

Dear Counsel:

You will receive shortly via e-mail an ftp link to access documents that Defendants are producing in accordance with the parties' meet and confer efforts and pursuant to their respective objections and responses to Plaintiffs' Requests for Production of Documents. The documents being produced today on behalf of CRA have been bates stamped CRA0096925-CRA0193613.

We anticipate continuing our rolling production of Defendants' documents next week or shortly thereafter. To reduce unnecessary expenses for all parties, we have also performed a "global de-duplication" across all custodians such that we are only producing one copy of an email even though multiple custodians may have possessed identical copies.

You may access the ftp link with the same passwords circulated with Defendants' last production on August 13, 2013. Please let us know if you have any questions with the foregoing or any problems accessing the production.



August 23, 2013  
Page 2

Sincerely,

A handwritten signature in black ink, appearing to be "Bryna J. Dahlin", with a large, sweeping flourish extending to the right.

Bryna J. Dahlin

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**BRYNA J. DAHLIN**

Partner

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September 4, 2013

**VIA ELECTRONIC MAIL**

David S. Elkins  
Squire, Sanders & Dempsey (US) LLP  
600 Hansen Way  
Palo Alto, California 94304

Adam R. Fox  
Anne Choi Goodwin  
Squire, Sanders & Dempsey (US) LLP  
555 South Flower Street, 31<sup>st</sup> Floor  
Los Angeles, CA 90071

John A. Burlingame  
Squire, Sanders & Dempsey (US) LLP  
1200 19<sup>th</sup> St., NW Ste. 300  
Washington, DC 20036

Re: *Western Sugar Cooperative, et al. v*  
*Archer-Daniels-Midland et al.*: Defendants'  
**Production of Documents**

Dear Counsel:

You will receive shortly via e-mail an ftp link to access documents that Defendants are producing in accordance with the parties' meet and confer efforts and pursuant to their respective objections and responses to Plaintiffs' Requests for Production of Documents. The documents being produced today on behalf of CRA have been bates stamped CRA0193614 – CRA0586589.

This production substantially completes the production of documents on behalf of CRA, although we anticipate a smaller follow-up production(s) in the next few weeks. We expect to continue our rolling production of Defendants' documents next week with documents from the CRA Member Companies.

You may access the ftp link with the same passwords circulated with Defendants' previous productions. Please let us know if you have any questions with the foregoing or any problems accessing the production.

September 4, 2013  
Page 2

Sincerely,

A handwritten signature in black ink, appearing to be "Bryna J. Dahlin", with a large, sweeping flourish extending to the right.

Bryna J. Dahlin