

EXHIBIT C

Milberg's E-Discovery Practice: Leading the Way to Excellence

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Milberg LLP is a recognized leader in the field of electronic discovery. Among the first plaintiffs' firms in the country to assemble and train a dedicated team of lawyers and litigation support professionals to meet the e-discovery demands of major national litigation, Milberg has developed e-discovery capabilities that are exceptional among U.S. law firms.

An Experienced Team

Established nearly 10 years ago, Milberg's e-discovery and litigation technology support team offers clients the tools to go toe-to-toe with adversaries in the fast-evolving e-discovery climate. This multidisciplinary group offers a full array of services that include developing legal strategies and plans for pursuing and responding to discovery, shaping data preservation, spoliation and data collection issues, controlling data, managing data, conducting computer forensic analysis and providing educational training on e-discovery issues.

Alert to the Changing E-Discovery Landscape

To tackle new challenges that crop up in e-discovery, Milberg has established an E-Discovery Task Force that actively monitors developments in the law governing electronically stored information and oversees discovery practices at the firm. The Committee is comprised of several Milberg attorneys with extensive e-discovery experience and is chaired by partner Ariana J. Tadler, one of the most respected e-discovery practitioners in the field. Ms. Tadler serves on The Sedona Conference's Board and is also Co-Chair of the Steering Committee for The Sedona Conference® Working Group I on Electronic Document Retention and Production, the leading "think tank" on e-discovery. She also serves on the Advisory Board of Georgetown University Law Center's Advanced E-Discovery Institute, where she has helped educate federal judges on e-discovery issues.

State-of-the-Art Capability

Milberg has spent significant resources to build an e-discovery infrastructure that supports the firm's rapidly expanding work in the field. Building upon 25 terabytes of high speed computer storage, the firm hosts one of the most advanced e-discovery document review tools on the market, Relativity™. Relativity combines traditional review capabilities with advanced search and coding options to improve document discovery review efficiency and accuracy. Adding to that functionality, our review tool also integrates an industry leading "next generation" data analytic engine. Relativity Analytics™ enables legal teams to leverage high level computing to: group documents by concept, search millions of pages for document similarity, apply a statistically valid subset of coding across an entire database, and search in English across documents written in multiple languages.

Milberg has also recently implemented Method, a cutting edge document hold management system. With Method, Milberg can effectively track legal holds placed on both hard copy and electronic documents for an unlimited amount of data owners, be they corporate employees or private individuals. The ability to keep track and manage legal holds is particularly important in today's litigation-oriented landscape where some parties will attempt to litigate the technicalities of a case and not the merits.

Utilizing these state-of-the-art tools, Milberg can meet even the largest and most complex challenges involving electronically stored data.

A Strong Support Staff with World-Class Experience

Milberg's e-discovery practice is also supported by a deep bench of dedicated, full-time litigation support professionals who have extensive training and experience in handling complex e-discovery projects. The group is led by Paul H. McVoy, who has a significant background in managing large, international litigation involving complex e-discovery issues. He has directed collection and review in several high-profile merger investigations, including the first case ever to involve the production of documents in native format to the U.S. Department of Justice. In addition, Mr. McVoy also has considerable experience managing international discovery from Europe, Asia, the Middle East and South America.



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