

EXHIBIT C

From: Platzer, Luke C
Sent: Friday, June 17, 2011 12:10 PM
To: TSchoenberg@fbm.com; DGupta@fbm.com
Cc: ALeibnitz@fbm.com; RThompson@fbm.com; Fabrizio, Steven B; Pozza, Duane
Subject: RE: Privilege Logs

Tony:

I understand from our call yesterday that Defendants have declined Plaintiffs' proposal to use categorical privilege logs in this case. As Defendants have also declined our previous proposal for privilege log simplification in this case, it is my understanding that the meet and confer on this topic is now concluded, and that it is now incumbent upon Plaintiffs to consider whether to queue this issue up for the Court. (Although I briefly floated the prospect of a "hybrid" approach on the call with you yesterday, I subsequently realized that I had already discussed the idea with Rod on a different call last week, when he raised it, and that therefore, Defendants have already considered and rejected such an approach). If I am mistaken and Defendants intend to offer a counterproposal regarding privilege logging, please let me know as soon as possible.

Regards,
Luke

From: TSchoenberg@fbm.com [mailto:TSchoenberg@fbm.com]
Sent: Monday, June 13, 2011 2:14 PM
To: Platzer, Luke C; DGupta@fbm.com
Cc: ALeibnitz@fbm.com; RThompson@fbm.com; Fabrizio, Steven B; Pozza, Duane
Subject: RE: Privilege Logs

Thursday works for me. How about 1pm PST?

-----Original Message-----

From: Platzer, Luke C [mailto:LPlatzer@jenner.com]
Sent: Monday, June 13, 2011 11:02 AM
To: Schoenberg, Tony (28) x4963; Gupta, Deepak (22) x4419
Cc: Leibnitz, Andrew (21) x4932; Thompson, Rod (27) x4445; Fabrizio, Steven B; Pozza, Duane
Subject: RE: Privilege Logs

Thanks, Tony. On the housekeeping front, we think this should be styled as a joint addendum/supplement to the proposed scheduling report, since we are in effect modifying our proposal to the Court. But if your local counsel thinks otherwise, I am happy to entertain other procedural vehicles for the stipulation.

For a substantive conversation about the logs, my Thursday is wide open if there's a time (preferably during East Coast business hours) that works for you?

From: TSchoenberg@fbm.com [mailto:TSchoenberg@fbm.com]
Sent: Monday, June 13, 2011 1:40 PM
To: Platzer, Luke C; DGupta@fbm.com
Cc: ALeibnitz@fbm.com; RThompson@fbm.com; Fabrizio, Steven B; Pozza, Duane
Subject: RE: Privilege Logs

Luke -- We're checking with our local counsel on the housekeeping part of this. We'll get back to you about that hopefully later today. I would like to talk further with you about the substantive issue (i.e., categorical logs). When are you available this week to talk?

-----Original Message-----

From: Platzer, Luke C [mailto:LPlatzer@jenner.com]

Sent: Monday, June 13, 2011 7:39 AM

To: Schoenberg, Tony (28) x4963; Gupta, Deepak (22) x4419

Cc: Leibnitz, Andrew (21) x4932; Thompson, Rod (27) x4445; Fabrizio, Steven B; Pozza, Duane

Subject: Privilege Logs

Tony and Deepak –

Defendants informed us last week that they are still considering our proposal to utilize categorical privilege logs, and that the parties have agreed to continue the originally-proposed June 15 date for exchanging privilege logs. As a housekeeping matter, we believe that – even though the Court has not entered an order regarding the June 15 date – that our agreement to continue the date should be filed as a stipulation with the Court, given that it is relevant to the court’s consideration of the proposed schedule. Agreed? If so, we can take the lead on drafting something for your signature.

- Luke

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