

EXHIBIT C

Gary, Laura

From: Swift, Kristen
Sent: Monday, April 20, 2009 9:08 AM
To: Edward B. Krugman; Askew, Tony; John H. Rains IV; r.bruce.rich@weil.com; Todd.Larson@weil.com; randi.singer@weil.com
Cc: Schaetzel, Steve; Mary Jo Volkert; Cynthia Hall; Burns.Newsome@usg.edu; Kerry Heyward; Swift, Kristen
Subject: RE: Cambridge v. GSU/ Deposition Schedule
Follow Up Flag: Follow up
Flag Status: Red

Edward,

Per my voicemail of this morning, please let us know when you are available this morning to discuss. Our availability is much more limited late morning and through the afternoon.

Thanks,
 Kristen

From: Edward B. Krugman [mailto:krugman@bmelaw.com]
Sent: Friday, April 17, 2009 4:22 PM
To: Askew, Tony; John H. Rains IV; r.bruce.rich@weil.com; Todd.Larson@weil.com; randi.singer@weil.com
Cc: Schaetzel, Steve; Mary Jo Volkert; Cynthia Hall; Burns.Newsome@usg.edu; Kerry Heyward; Swift, Kristen
Subject: RE: Cambridge v. GSU/ Deposition Schedule

Tony,

I left you a voicemail. We do want to talk first thing on Monday to discuss this issue. Thanks.

Edward

From: Askew, Tony [mailto:TAskew@KSLAW.com]
Sent: Friday, April 17, 2009 4:20 PM
To: John H. Rains IV; Edward B. Krugman; r.bruce.rich@weil.com; Todd.Larson@weil.com; randi.singer@weil.com
Cc: Schaetzel, Steve; Mary Jo Volkert; Cynthia Hall; Burns.Newsome@usg.edu; Kerry Heyward; Swift, Kristen
Subject: Cambridge v. GSU/ Deposition Schedule
Importance: High

John,

We have your message regarding the Palmour and Burtle depositions on Thursday and Friday of next week.

With respect to further depositions, we remain convinced that the ten deposition limit as provided by the Federal Rules should be followed in this case and should be adequate.

5/5/2009

Since only two depositions have been taken so far by the Plaintiffs, it is our suggestion that you proceed with eight additional depositions. Upon completion of your ten depositions, we will be prepared to discuss with you compelling reasons for an increase in the number of depositions. If we are unable to reach agreement as to an increase (if any) in the number of depositions, it seems that would be the appropriate time to request relief from the Court. In view of your plans to take two more depositions on Thursday and Friday of next week, we do request that you let us know as soon as possible the identity of the remaining six witnesses you wish to depose next so that we can begin the scheduling of those witnesses.

In any event, we will be glad to discuss these issues with you and Edward next Monday as you have requested..

Best Regards, Tony Askew

From: John H. Rains IV [mailto:rains@bmelaw.com]

Sent: Friday, April 17, 2009 3:35 PM

To: Swift, Kristen; Edward B. Krugman; r.bruce.rich@weil.com; Todd.Larson@weil.com; randi.singer@weil.com

Cc: Askew, Tony; Schaetzel, Steve; Mary Jo Volkert; Cynthia Hall; Burns.Newsome@usg.edu; Kerry Heyward

Subject: RE: Cambridge v. GSU/ Letter to E. Krugman

Kristen,

We still intend to take the depositions of Jim Palmour and Laura Burtle, as previously agreed, next week. Both depositions will be taken in Room 3 at the State Bar Headquarters and will begin at 10:00 a.m. Palmour's deposition will be next Thursday, 4/23 and Burtle's will be next Friday, 4/24.

As for the remaining depositions, our hope is that we can work out some compromise that will allow us to complete the necessary discovery in this case. Edward and I will try to reach you and Tony by phone on Monday to discuss the issue of the additional depositions.

Best regards,

John

John H. Rains IV
Bondurant, Mixson & Elmore
1201 West Peachtree St. NW
Suite 3900
Atlanta, GA 30309
www.bmelaw.com
Direct Line: (404) 881-4128
Fax: (404) 881-4111
rains@bmelaw.com

From: Swift, Kristen [mailto:KSwift@KSLAW.com]

Sent: Thursday, April 16, 2009 4:39 PM

To: Edward B. Krugman; John H. Rains IV; r.bruce.rich@weil.com; Todd.Larson@weil.com;

randi.singer@weil.com

Cc: Askew, Tony; Schaetzel, Steve; Mary Jo Volkert; Cynthia Hall; Burns.News@usg.edu; Kerry Heyward; Swift, Kristen

Subject: Cambridge v. GSU/ Letter to E. Krugman

Counsel:

Please see the attached correspondence.

Regards,

Kristen A. Swift
KING & SPALDING LLP
1180 Peachtree Street NE
Atlanta, GA 30309-3521
Tel: (404) 572-4762
Fax: (404) 572-5134

Confidentiality Notice

This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

Confidentiality Notice

This message is being sent by or on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.