## **EXHIBIT C**

## FISH & RICHARDSON P.C.

One Marina Park Drive Boston, Massachusetts 02210-1878

Telephone 617 542-5070

Facsimile 617 542-8906

Web Site www.fr.com

Frederick P. Fish 1855-1930

W.K. Richardson 1859-1951

## BY ELECTRONIC MAIL

October 17, 2011

Jonathan Zavin, Esq. Loeb & Loeb LLP 345 Park Avenue New York, NY 10154-0037

Re:

Jayme Gordon v. DreamWorks Animation SKG, Inc., et al.

USDC-MA - C.A. No. 1:11-cv-10255-JLT



ATLANTA

AUSTIN

BOSTON

DALLAS

DELAWARE

HOUSTON

MUNICH

NEW YORK

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

SOUTHERN CALIFORNIA

Dear Mr. Zavin:

We are in receipt of your letter of today, which you term a response to Mr. Madera's letter of October 14, 2011. However, it is not a response at all.

You state in your letter that any investigation of Mr. Gordon has been done solely in connection with his claims and not done with an intention to harass or intimidate. That representation is simply not true. Your investigators have repeatedly followed Mr. Gordon, including actually chasing Mr. Gordon in his car on more than one occasion. Your investigators have also followed Mr. Gordon's wife, son, and his elderly mother. In addition, your investigators have shown a photograph of Mr. Gordon to Mr. Gordon's neighbors, implying that Mr. Gordon had done something improper. These encounters included minor children who were unaccompanied by an adult. Such actions have no connection to the claims at issue in this case and are solely designed to harass and intimidate. We intend to bring your activities to the attention of the Court and seek a protective order and appropriate sanctions.

Until this issue has been resolved, Mr. Gordon will not be sitting for his deposition, and will therefore not be appearing on Wednesday.

Very truly yours, Irogiz a Moder c Transla Brooks

Gregory A. Madera Juanita Brooks

GAM/kal

Cc: Julia Huston, Esq.