

EXHIBIT C



WILLENKEN

WILLENKEN WILSON LOH & LIEB LLP

November 29, 2011

VIA ELECTRONIC MAIL AND
U.S. MAIL

Enrico Schaefer, Esq.
Traverse Legal
810 Cottageview Drive, Suite G-20
Traverse City, MI 49684

Re: *Weather Underground v. Navigation Catalyst Systems, Inc.*

Dear Enrico:

I write in response to your letter of November 11, 2011. Please note as follows:

- Donald Misino is no longer an employee of Defendants. I will reach out to him to determine whether he will agree to attend trial in Detroit, Michigan.
- Mavi Llamas is no longer an employee of Defendants. I will reach out to her to determine whether she will agree to attend trial in Detroit, Michigan.
- Dennis Rhee is no longer an employee of Defendants. I will reach out to him to determine whether he will agree to attend trial in Detroit, Michigan.
- Chris Pirrone is currently an employee of Defendants, but will not be employed by Defendants at the time of trial. To the extent you intend to introduce testimony from Mr. Pirrone in your case-in-chief, I think you should plan on proceeding with his deposition testimony.
- Art Shaw is not an employee of Defendants. To the extent you intend to introduce testimony from Mr. Shaw in your case-in-chief, I think you should plan on proceeding with his deposition testimony.
- David Graff is an employee of Defendants and will be present at counsel's table throughout the trial. That said, given the Court's ruling on Epic's Motion for Summary Judgment, I do not know why you are asking for his availability.
- Seth Jacoby is no longer an employee of Defendants. To the extent you intend to introduce testimony from Mr. Jacoby in your case-in-chief, I think you should plan on proceeding with his deposition testimony.



- Lily Stevenson is currently employed by Defendants. I will determine whether she will be available for trial.

For Defendants' witnesses, we will need to agree on a reasonable schedule that accommodates their travel schedule so that they do not have to be present in Detroit for the entire duration of the trial.

In the interim, should you have any questions, please call me.

Very truly yours,

William A. Delgado