

EXHIBIT C

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BY ELECTRONIC MAIL

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Re: Master File C.A. No. 1:00-1898 (SAS), M21-88, MDL No. 1358
Commonwealth of Puerto Rico – Defendants' Trial Site Designations

Dear Mike:

Pursuant to the Court's direction, Defendants hereby designate the following "trial" sites:

PRASA FACILITY No.	FACILITY NAME	ADDRESS	MUNICIPALITY
S4C030W	POZO CLUB DE LEONES	CARR. 103 KM. 4.3, BO. BAJURAS	CABO ROJO
E12004W	GUAYAMA URBANO FILTRATION PLANT	CALLE MIRAFLORES FINAL	GUAYAMA

Defendants' selection of these "trial sites" is not a waiver of – and we specifically reiterate and preserve now – our prior objections to the use of "trial sites" in this case. Furthermore, Defendants object to having to make these designations now because discovery is incomplete as to all of the sites identified by Plaintiffs in this case, all of the "discovery sites" previously designated by the parties and all of the "trial sites" identified above. Plaintiffs have failed to produce complete well files or water quality data for all of the sites identified above (or any other PRASA receptors at issue in this matter), despite the Court's May 2, 2012 order to do so; and have failed to produce complete information and/or materials in response to Defendants' other discovery requests concerning identified "release sites".

U.S. practice conducted through McDermott Will & Emery LLP.

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