

EXHIBIT C

Jennifer L. Young
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May 4, 2012

Alexander H. Southwell
Gibson, Dunn & Crutcher LLP
200 Park Avenue
New York, NY 10166-0193

Re: *Ceglia v. Zuckerberg*, No. 10-0569 (W.D.N.Y.)

Dear Mr. Southwell:

I write in response to your May 3, 2012 letter, in which you make certain requests, addressed below, regarding our April 30, 2012 production of Privilege Log Items 334, 348, 360, and 379.

Native Format Request

We do not object to you obtaining from Stroz Friedberg the native files that correspond to Privilege Log Items 348, 360, and 379, in accordance with the Electronic Asset Inspection Protocol [Dkt. No. 85] previously ordered by the Court. To the extent you suggest that our format of production was improper, I direct you to the last page of the Court's April 19, 2012 Order [Dkt. No. 357], which directed that Plaintiff produce "copies" of the specified documents.

This consent is not a waiver of the arguments we presented to the Court on our Objection [Dkt. No. 367] to Magistrate Judge Foschio's privilege ruling, including our request that the Court order you to return Privilege Log Items 360 and 379 in the event the Court rules that they are privileged. Finally, to avoid any ambiguity, we *do not* consent to you obtaining Privilege Log Item 334 in native format.

Confidentiality Designations

You request that we remove the confidentiality designations from Privilege Log Items 334, 348, 360, and 379. We agree to dedesignate as confidential Privilege Log Item 348.

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We will not dedesignate as confidential Privilege Log Items 334, 360, or 379. Privilege Log Item 334 contains

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Likewise, we will not dedesignate as confidential Privilege Log Items 360 and 379. As you know, we continue to maintain that those documents are privileged, and our Objection to Magistrate Judge Foschio's privilege ruling remains pending. An agreement to dedesignate as confidential Privilege Log Items 360 and 379 would be inconsistent with our continued claim of privilege. In addition, because Privilege Log Items 360 and 379 contain

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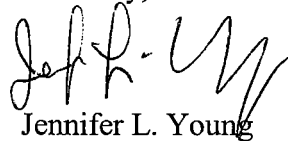
the Joint Stipulated Protective Order [Dkt. No. 86]. Nonetheless, we are willing to revisit the confidentiality designations on Privilege Log Items 360 and 379 once the Court has ruled on our Objection.

Request for April 13, 2011 Letter

You request that we produce an April 13, 2011 letter from the Kasowitz firm to certain of Plaintiff's former and current counsel. Given that we received your request for this document on May 3, 2012 at 5:51 pm, your purported "deadline" of today at noon for its production is unreasonable. We will respond to your request promptly, and we expect to do so on Monday, May 7, 2012.

We are available to continue to meet and confer with you on these issues. Please contact me with any questions.

Sincerely,



Jennifer L. Young

cc: Sanford P. Dumain
Melissa R. Clark
Dean M. Boland
Paul A. Argentieri
Robert B. Calihan
Peter K. Skivington
Orin S. Snyder