

EXHIBIT C

July 13, 2011

VIA ELECTRONIC MAIL

Jeffrey A. Lake, Esq.
Jeffrey A. Lake A.P.C.
835 5th Avenue, Suite 200A
San Diego, California 92101

Re: Ceglia v. Zuckerberg and Facebook, Inc., No. 1:10-cv-569 (RJA)

Dear Mr. Lake:

We write to confirm your agreement that the Hard Copy inspection will begin at 9:00 a.m. on July 14, 2011 at the offices of Harris Beach LLC. Additionally, the Electronic Asset inspection will begin at 9:00 a.m. on Friday, July 15, 2011, at the offices of Project Leadership Associates, 120 South LaSalle, Suite 1200, Chicago, IL; Sylint, 240 N. Washington Blvd., Suite 240, Sarasota, FL; and Harris Beach LLC in Buffalo.

We understand that Mr. Argentieri will be delivering the Hard Copy Documents to the offices of Harris Beach LLC on July 14th from the Steuben Trust Company safe-deposit box, where Mr. Argentieri has stated the purported original contract has been stored. See Argentieri Decl., ¶ 3. In order that we may have a clear picture of the chain of custody for our experts, and given the risk of past and future document fabrication by Plaintiff in this case—a significant concern substantiated by Judge Foschio during oral argument during the June 30, 2011 hearing—we request the records, dating from January 1, 2010 to the present, from the Steuben Trust Company documenting access to the safe-deposit box in which the purported original contract has been stored. In the event that Plaintiff refuses to produce these records, Defendants will seek judicial intervention. Please confirm that you will provide these access records as soon as possible and no later than July 14th at 12:00 p.m.

In addition, as you know, Plaintiff has had an ongoing duty to preserve all evidence relevant to this litigation since at least June 30, 2010. Indeed, we reminded your client of that obligation in a letter to Plaintiff's former counsel, Terrence Connors, dated July 30, 2010. Every computer or other electronic media that Plaintiff has used since the commencement of this litigation and before is relevant to the critical threshold issue: the authenticity of the purported contract and alleged emails. Thus, we expect that all of those electronic assets remain in Plaintiff's possession, custody, or control, and will be produced to Defendants on or before July 15, 2011, pursuant to the Court's Order. Furthermore, we expect Plaintiff to

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include in his sworn declaration required by the July 1st Order a statement certifying that he has preserved all such computers or other electronic media and produced all of those electronic assets to Defendants. See Order at 2. If Plaintiff refuses to certify compliance with his preservation obligations in this manner, Defendants will seek judicial intervention and an order directing him to do so.

Very truly yours,

/s/
Orin Snyder

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