

Exhibit C

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
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September 29, 2010

Paul Doolittle, Esq.
Jekel-Doolittle LLC
P.O. Box 2579
Mount Pleasant, SC 29464

RE: Cleveland Golf
Roger Cleveland Golf Company, Inc. v. Christopher Prince, Sheldon Shelley,
Prince Distribution, LLC, and Bright Builders, Inc.
Case No.: 2:09-cv-02119 MBS
NMRS File No.: 34230/01504

Dear Paul:

Enclosed please find the following Notices of Depositions in the above-referenced matter:

- October 11, 2010 at 9:00am MDT for Michael Johnson;
- October 11, 2010 at 11:00am MDT for Brigham Budd;
- October 11, 2010 at 2:00pm MDT for Emily Davies;
- October 12, 2010 at 9:00am MDT for 30(b)(6) of Bright Builders, Inc.;
- October 12, 2010 at 1:00pm MDT for Gregory Cole; and
- October 12, 2010 at 3:00pm MDT for Brian Cole.

All of these depositions will be held at the Provo Marriott Hotel and Conference Center in Provo, Utah and there is a 48-hour cancellation requirement should these depositions need to be rescheduled. Therefore, please let me know as soon as possible if there are any conflicts with the dates and times listed above.

Very truly yours,



John C. McElwaine

JCM:pd
Enclosures
cc: Christopher D. Lizzi, Esq. (w/enc)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS

)
Plaintiff,)

)
vs.)

) **AMENDED NOTICE OF DEPOSITION**
) **OF MICHAEL JOHNSON**

)
Christopher Prince, Sheldon Shelley, Prince)
Distribution, LLC, and Bright Builders,)
Inc..)

)
Defendants.)

TO: PAUL DOOLITTLE, ESQ., ATTORNEY FOR DEFENDANT BRIGHT BUILDERS, INC.:

PLEASE TAKE NOTICE that counsel for Plaintiff will take the oral deposition of **Michael Johnson** pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 11, 2010 at 9:00 a.m. MDT at the Provo Marriott Hotel and Conference Center located at 101 West 100 North, Provo, Utah 84601.**

This deposition will be taken before a certified court reporter and an officer authorized to administer oaths, or equally qualified persons. The deposition is to be used in the above-entitled and numbered causes for all purposes authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

You are hereby invited to be present and examine the witness as you may be advised in the premises.

SIGNATURE ON FOLLOWING PAGE

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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(617) 573-4723

Attorneys for Plaintiff Roger Cleveland Golf Company, Inc.

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

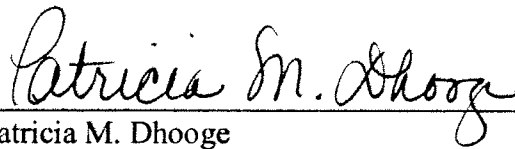
Pleadings:

AMENDED NOTICE OF DEPOSITION OF MICHAEL
JOHNSON

Counsel Served:

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Lizzi Law Firm, PC
PO Box 61899
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Patricia M. Dhooge
Administrative Assistant

September 29, 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS
)
Plaintiff,)
)
vs.) **AMENDED NOTICE OF DEPOSITION**
) **OF BRIGHAM BUDD**
)
Christopher Prince, Sheldon Shelley, Prince)
Distribution, LLC, and Bright Builders,)
Inc..)
)
Defendants.)

TO: PAUL DOOLITTLE, ESQ., ATTORNEY FOR DEFENDANT BRIGHT BUILDERS, INC.:

PLEASE TAKE NOTICE that counsel for Plaintiff will take the oral deposition of **Brigham Budd** pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 11, 2010 at 11:00 a.m. MDT at the Provo Marriott Hotel and Conference Center located at 101 West 100 North, Provo, Utah 84601.**

This deposition will be taken before a certified court reporter and an officer authorized to administer oaths, or equally qualified persons. The deposition is to be used in the above-entitled and numbered causes for all purposes authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

You are hereby invited to be present and examine the witness as you may be advised in the premises.

SIGNATURE ON FOLLOWING PAGE

NELSON MULLINS RILEY & SCARBOROUGH LLP

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(617) 573-4723

Attorneys for Plaintiff Roger Cleveland Golf Company, Inc.

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

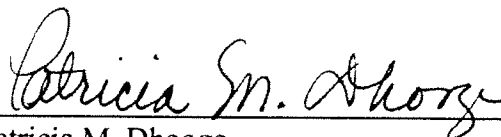
Pleadings:

AMENDED NOTICE OF DEPOSITION OF BRIGHAM BUDD

Counsel Served:

Christopher D. Lizzi, Esq.
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PO Box 61899
N. Charleston, SC 29419

Paul Doolittle, Esq.
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P.O. Box 2579
Mount Pleasant, SC 29464



Patricia M. Dhooge
Administrative Assistant

September 29, 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS

)
Plaintiff,)

)
vs.)

) **AMENDED NOTICE OF DEPOSITION**
) **OF EMILY DAVIES**

)
Christopher Prince, Sheldon Shelley, Prince)
Distribution, LLC, and Bright Builders,)
Inc..)

)
Defendants.)

TO: PAUL DOOLITTLE, ESQ., ATTORNEY FOR DEFENDANT BRIGHT BUILDERS, INC.:

PLEASE TAKE NOTICE that counsel for Plaintiff will take the oral deposition of **Emily Davies** pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 11, 2010 at 2:00 p.m. MDT at the Provo Marriott Hotel and Conference Center located at 101 West 100 North, Provo, Utah 84601.**

This deposition will be taken before a certified court reporter and an officer authorized to administer oaths, or equally qualified persons. The deposition is to be used in the above-entitled and numbered causes for all purposes authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

You are hereby invited to be present and examine the witness as you may be advised in the premises.

SIGNATURE ON FOLLOWING PAGE

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Attorneys for Plaintiff Roger Cleveland Golf Company, Inc.

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

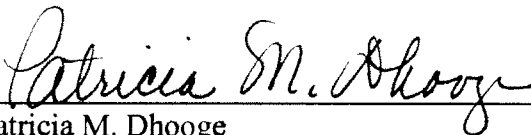
Pleadings:

AMENDED NOTICE OF DEPOSITION OF EMILY DAVIES

Counsel Served:

Christopher D. Lizzi, Esq.
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N. Charleston, SC 29419

Paul Doolittle, Esq.
Jekel-Doolittle LLC
P.O. Box 2579
Mount Pleasant, SC 29464



Patricia M. Dhooge
Administrative Assistant

September 29, 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS
))
) Plaintiff,))
))
) vs.))
))
Christopher Prince, Sheldon Shelley, Prince))
Distribution, LLC, and Bright Builders,))
Inc.))
))
) Defendants.))

AMENDED NOTICE OF DEPOSITION

TO: Paul Doolittle, Esq.
Jekel-Doolittle LLC
P.O. Box 2579
Mount Pleasant, SC 29464

PLEASE TAKE NOTICE that on **Tuesday, October 12, 2010 at 9:00 a.m. MDT at the Provo Marriott Hotel and Conference Center located at 101 West 100 North, Provo, Utah 84601.** Plaintiff, Roger Cleveland Golf Company, Inc., by their attorneys, will take the deposition upon oral examination of **Defendant, Bright Builders, Inc.** pursuant to Fed. R. Civ. P. 30 before an officer authorized by law to administer oaths in the state of Utah. The proceedings will be recorded stenographically. Defendant is hereby required to designate one or more officers, directors, managing agents, or other persons authorized to speak on its behalf on the issues listed herein. The deposition will begin on the date and time specified above and will continue day to day thereafter, excluding weekends and holidays, until completed or as otherwise agreed. The deposition is to be used in the above-entitled and numbered cause for all purposes

authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence. You are invited to attend and take such part as is fit and proper.

Defendant is hereby required to designate one or more officers, directors, managing agents or other employees to testify, pursuant to Rule 30(b)(6), to matters known or reasonably available to Defendant regarding the following:

DEFINITIONS

1. As used herein, the term "Websites" shall refer to the websites copycatclubs.com, worldtimegolf.com, myscrubs4u.com, and legacygolfclubs.com, which are referred to in Plaintiff's Complaint, as well as any other website (i) registered to, owned by or associated with Defendant Christopher Prince or Defendant Prince Distribution, LLC and (ii) in relation with which you have provided any services, support or consultation.

2. As used herein, the term "Cleveland Golf Trademarks" shall mean those trademarks referenced in Paragraph 15 of the First Amended Complaint.

CATEGORIES OF INQUIRY

1. Defendant's corporate structure, including but not limited to any parent, affiliate, related company or subsidiary of Defendant.

2. The formation of Defendant, including but not limited to, articles of incorporation, by-laws, annual reports, identities of officers and directors and members, shareholder agreements, and amendments related thereto.

3. The nature and purpose of the products and services Defendant provided from 2008 to the present to Defendant Christopher Prince or Defendant Prince Distribution, LLC, including but not limited to the products and services provided in reference to Bright Builders Account No. 170729.

4. The nature and contents of the documents, both electronic and written, exchanged from 2008 to the present between Defendant, on the one hand, and Defendant Christopher Prince or Defendant Prince Distribution, LLC, on the other.
5. The nature and contents of all classes or training seminars, and all documents provided in connection therewith, that Defendant offered from 2008 to the present to Defendant Christopher Prince or Defendant Prince Distribution, LLC.
6. All conversations or discussions from 2008 to the present between Defendant, on the one hand, and Defendant Christopher Prince or Defendant Prince Distribution, LLC, on the other, in which either the Websites or the sale of golf equipment was discussed.
7. All conversations or discussions from 2008 to the present between Defendant, on the one hand, and Defendant Christopher Prince or Defendant Prince Distribution, LLC, on the other, with respect to the Websites.
8. The conception, creation, operation and content of the Websites, and Defendant's knowledge thereof.
9. The sale of Cleveland Golf branded golf clubs sold through the Websites, and Defendant's knowledge thereof.
10. The use of Cleveland Golf Trademarks on the Websites, and Defendant's knowledge thereof.
11. The nature of the support and maintenance services Defendant provided in relation to the Websites.
12. Payments that Defendant received from Defendant Christopher Prince or Defendant Prince Distribution, LLC, from 2008 to the present.

13. Defendant's retention policies applicable to records related to the products and services Defendant provided from 2008 to the present to Defendant Christopher Prince or Defendant Prince Distribution, LLC, including but not limited to the retention policies applicable to records related to Bright Builders Account No. 170729.

14. Defendant's policies related to the recording of communications with customers, and the transcription of such recordings.

15. Other lawsuits or litigation threats made or instituted against Defendant relating to trademark infringement, counterfeiting, unfair trade practices or fraud.

16. Other lawsuits or litigation threats made or instituted against Defendant relating to the Websites.

17. Defendant's responses to Plaintiff's discovery requests, including but not limited to the documents provided in response to Plaintiff's discovery requests.

Defendant Bright Builders, Inc. is also requested to identify who its representative(s) regarding the above issues will be in advance of the deposition.

[Signature Block on Following Page]

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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(617) 573-4723

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned administrative assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

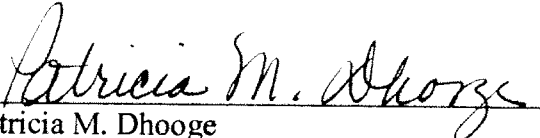
Pleadings:

AMENDED NOTICE OF DEPOSITION OF DEFENDANT
BRIGHT BUILDERS, INC.

Counsel Served:

Paul Doolittle, Esq.
Jekel-Doolittle LLC
P.O. Box 2579
Mount Pleasant, SC 29464

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PO Box 61899
N. Charleston, SC 29419


Patricia M. Dhooge

September 29, 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS

)
Plaintiff,)

)
vs.)

NOTICE OF DEPOSITION
OF GREGORY COLE

)
Christopher Prince, Sheldon Shelley, Prince)
Distribution, LLC, and Bright Builders,)
Inc..)

)
Defendants.)

TO: PAUL DOOLITTLE, ESQ., ATTORNEY FOR DEFENDANT BRIGHT BUILDERS, INC.:

PLEASE TAKE NOTICE that counsel for Plaintiff will take the oral deposition of **Gregory Cole** pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 12, 2010** at **1:00 p.m. MDT** at the **Provo Marriott Hotel and Conference Center** located at **101 West 100 North, Provo, Utah 84601**.

This deposition will be taken before a certified court reporter and an officer authorized to administer oaths, or equally qualified persons. The deposition is to be used in the above-entitled and numbered causes for all purposes authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

You are hereby invited to be present and examine the witness as you may be advised in the premises.

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(617) 573-4723

Attorneys for Plaintiff Roger Cleveland Golf Company, Inc.

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

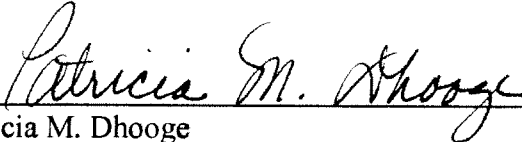
Pleadings:

AMENDED NOTICE OF DEPOSITION OF GREGORY COLE

Counsel Served:

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N. Charleston, SC 29419

Paul Doolittle, Esq.
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P.O. Box 2579
Mount Pleasant, SC 29464



Patricia M. Dhooge
Administrative Assistant

September 29, 2010

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Roger Cleveland Golf Company, Inc.,) Civil Action No. 2:09-2119-MBS

)
Plaintiff,)

vs.)

NOTICE OF DEPOSITION
OF BRIAN COLE

)
Christopher Prince, Sheldon Shelley, Prince)
Distribution, LLC, and Bright Builders,)
Inc..)

)
Defendants.)

TO: PAUL DOOLITTLE, ESQ., ATTORNEY FOR DEFENDANT BRIGHT BUILDERS, INC.:


PLEASE TAKE NOTICE that counsel for Plaintiff will take the oral deposition of **Brian Cole** pursuant to Rule 30 of the Federal Rules of Civil Procedure, on **October 12, 2010 at 3:00 p.m. MDT at the Provo Marriott Hotel and Conference Center located at 101 West 100 North, Provo, Utah 84601.**

This deposition will be taken before a certified court reporter and an officer authorized to administer oaths, or equally qualified persons. The deposition is to be used in the above-entitled and numbered causes for all purposes authorized by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

You are hereby invited to be present and examine the witness as you may be advised in the premises.

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NELSON MULLINS RILEY & SCARBOROUGH LLP

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Morgan T. Nickerson
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Attorneys for Plaintiff Roger Cleveland Golf Company, Inc.

Charleston, South Carolina

September 29, 2010

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Plaintiff Roger Cleveland Golf Company, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

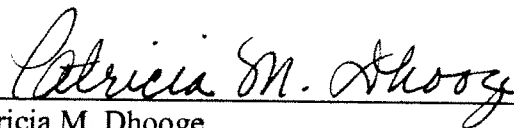
Pleadings:

AMENDED NOTICE OF DEPOSITION OF BRIAN COLE

Counsel Served:

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Patricia M. Dhooge
Administrative Assistant

September 29, 2010