

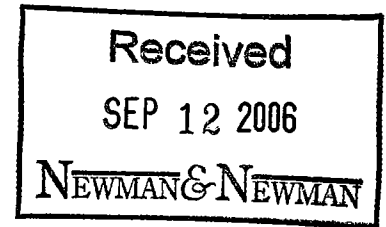
EXHIBIT C

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MEMORANDUM

To: Derek Newman
From: Adana N. Lloyd
Date: September 11, 2006
Subject: Gordon v. Virtumundo
Defendant's First Discovery Requests

Dear Mr. Newman:

On the enclosed DVD, please find Plaintiff's First Supplemental Responses to Defendant's First Discovery Requests.

Please feel free to contact Mr. Siegel with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads "Adana N. Lloyd".

Adana N. Lloyd
Paralegal
Merkle, Siegel, & Friedrichsen

CONTENTS OF: DVD

Provided As Plaintiffs' First Supplemental Responses To Defendants' First Discovery Requests

<u>File/Folder Name</u>	<u>Description of contents</u>
Legend	This tool explains Plaintiffs' theory as to the proper construction of an email header as well as the errors and/or omissions by a spammer – noted in yellow and red highlights.
Email Analysis Virt	This is an analysis of each set of emails from a given domain and/or IP address for the emails sent by, or on behalf of Defendants to Plaintiffs. The highlights (from the legend) tells the reader which violations of the statute are indicated.
Email Analysis V Bates	This is a .pdf file containing the email analysis, which is Bates stamped.
Virtumundo Complaints	Complaints sent directly to Defendants
Spam reports	These emails represent complaints to various spammer sources in response to spam emails received by Plaintiffs– there are in excess of 12,000 unique complaints.
spam reports 2	This folder is a continuation of the previous one – there are close to 4-5,000 duplicate emails due to an unintended mixing up of back-up files with original emails.
Rejects	Plaintiffs' auto-responder immediately (within minutes or hours) sent cease and desist messages to all spammers. Each of these bounces was caused by a bad/non-working return address.
Contract Bounces	Recent auto-responder cease and desist messages to spammers (12/15/05 to 5/20/06). The absence of a bounce for a spammer likely means that the cease and desist message was received by the spammer, or the source. A bounce from a spammer means that the spammer used a bad return address.
Eudora	Eudora is Qualcomm's email client, the email utility utilized by Plaintiffs, and in which the original emails at issue here were received. This application opens the .mbx and .toc files on the disk. The .mbx and .toc MUST be paired as you can not open one without the other. All of the mailbox files must be placed in the C:/Program Files/Qualcomm/Eudora directory on the reader's hard drive.