

EXHIBIT C

E-Mails between James Tamm, R.J. Cronkhite and
Kevin Gleeson dated 12/3/18

Michael Bonvolanta

From: James Tamm
Sent: Wednesday, December 05, 2018 8:58 AM
To: Michael Bonvolanta
Subject: FW: Hack/Milford Deposition



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From: R.J. Cronkhite [<mailto:RCronkhite@maddinhauser.com>]
Sent: Monday, December 03, 2018 10:44 PM
To: Gleeson, Kevin J. <kgleeson@swappc.com>
Cc: James Tamm <jetamm@odtlegal.com>; Toupin, April D. <atoupin@swappc.com>; Carolyn Rowland <cmrowland@odtlegal.com>
Subject: Re: Hack/Milford Deposition

I will provide tomorrow, Kevin.

R.J.

Sent from the road.

On Dec 3, 2018, at 10:20 PM, Gleeson, Kevin J. <kgleeson@swappc.com> wrote:

RJ you will have to serve a subpoena for the deposition promptly.

On Dec 3, 2018 9:46 PM, "R.J. Cronkhite" <RCronkhite@maddinhauser.com> wrote:

Jim,

I am proceeding with the deposition on December 18. You are invited to attend or have one of Defendants' other three attorneys with appearances on file attend.

I have repeatedly requested Defendants' counsel (who are four in total) to provide availability; you alone have responded by claiming you're unavailable for 2.5 months. This unavailability, your persistent refusal to identify alternate dates of availability, and co- Defense counsels' refusal to provide dates of availability, smacks of obstruction and non-cooperation.

If motion practice becomes necessary based on the above, I intend to seek costs.

R.J.

From: James Tamm [<mailto:jetamm@odtlegal.com>]
Sent: Monday, December 03, 2018 2:11 PM
To: R.J. Cronkhite; Toupin, April D.
Cc: Gleeson, Kevin J.; Carolyn Rowland
Subject: RE: Hack/Milford Deposition

I will be returning from a wedding out of state and am not available on December 18.



James E. Tamm

Attorney at Law

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