

EXHIBIT C

Loeering, Becca

From: Randee Rogers <rru@brewerattorneys.com>
Sent: Friday, November 18, 2022 6:10 PM
To: nyrtreporter@gmail.com; Loeering, Becca; Brooke Burschlag; Sloan, Danielle; David Umansky; David Vu; Hayley Booker; Janie Mahan; Jonathan Conley; Kent Correll; M MacDougall; Mark Werbner; Monica Connell; Nyna Sargent; Bannon, Patrick; Processing Center; Randee Rogers; Samantha Block; Farber, Seth; Stephen Thompson; Svetlana Eisenberg; Tom McLish; Will Fleming
Cc: premiervip@lexitaslegal.com
Subject: NYAG v. NRA et al: Hines Deposition - Confidentiality Designations Pursuant to Protective Order

Counsel and Ms. Bidonde,

The NRA reviewed the transcript of Eric Hines's deposition for any confidentiality designations pursuant to the Protective Order.

Portions of the testimony are dependent on, relate to, or are based on Exhibits 1 and 2, which are Mr. Hines's report and rebuttal report.

Those reports, in turn, refer to information produced to the NYAG subject to the protections of the Protective Order.

As a result, the NRA designates any testimony based on the reports as confidential under the protective order. Naturally, the reports should be treated confidential pursuant to the protective order as well.

Regards,

Randee

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ATTORNEYS & COUNSELORS

From: Randee Rogers <rru@brewerattorneys.com>
Sent: Tuesday, November 8, 2022 12:25 PM
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Cc: Svetlana Eisenberg <sme@brewerattorneys.com>; David Umansky <diu@BrewerAttorneys.com>; David Vu <dsv@BrewerAttorneys.com>; Brooke Burschlag <blb@brewerattorneys.com>; Randee Rogers <rru@BrewerAttorneys.com>
Subject: RE: People of The State Of New York v. The NRA - Deposition Transcripts

Tenenbaum: <https://filecloud.brewerattorneys.com/Public/?folder=76c4c198>

Hines: <https://filecloud.brewerattorneys.com/Public/?folder=540b11bf>

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From: Randee Rogers

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Subject: People of The State Of New York v. The NRA - Deposition Transcripts

Counsel,

Shortly, I will be sending links to the transcripts and exhibits for the depositions of Eric Hines, taken by the NRA on November 3, 2022, and Jeffrey Tenenbaum, taken by the NRA on November 1, 2022.

The password for the Tenenbaum link is:

The password for the Hines link is:

Thank you.

Randee

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