

Exhibit C

From: O'Connor, Bridget K. <boconnor@kirkland.com>
Sent: Wednesday, February 19, 2014 7:32 PM
To: Strach, Phillip J.; Donovan, Daniel T.; Allen, Winn; Pocklington, Amy M.
Cc: Russ, John (CRT); Ryan, Elizabeth (CRT); Farr, Thomas A.; apeters@ncdoj.com; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); *dlieberman@advancementproject.org; Beck, Gill (USANCW); *ijoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; Imcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)
Subject: RE: NC HB 589 - Meet and Confer Follow Up

Phil:

Following up on Defendants' request to further prioritize our requests and refine our prior prioritization proposals, the Plaintiffs make the following suggestion:

1. The SBoE email searches that generated few documents (email searches 30, 32, 33, 34, 35, 42, 43 and 44), should be reviewed immediately and in total, reviewed without any date prioritization, and produced by Friday (2/21);
2. The SBoE email searches that generated less than 600 documents (email searches 4, 6, 13, 18, 25, 40, 41), should be reviewed this week and in total, reviewed without any date prioritization, and produced by Tuesday (2/24);
3. The following SBoE email searches (email searches 1, 29), should be reviewed by next week, reviewed without any date prioritization, and produced by Thursday (2/26);
4. The remaining SBoE email searches should be reviewed by starting presently and working your way back in time. We remain ready to discuss any searches that you believe are overbroad or that should have date restrictions. (Please see my prior email for examples of searches where we believe the search might have been run incorrectly and thus generated lots of results inadvertently.) We should start receiving documents from these reviews by Friday (2/28) and the review should be completed by March 10.

We offer this suggested path forward with full reservation of our rights and belief that there should not be any date restriction without further explanation by Defendants and agreement by Plaintiffs.

Sincerely,

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