

# **Exhibit C**

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**From:** Rancour, Kimberly D.  
**Sent:** Friday, March 21, 2014 5:54 PM  
**To:** phil.strach@ogletreedeakins.com; Amy.Pocklington@ogletreedeakins.com; thomas.farr@ogletreedeakins.com; apeters@ncdoj.gov; butch@butchbowers.com; bob.stephens@nc.gov  
**Cc:** Donovan, Daniel T.; O'Connor, Bridget K.; Allen, Winn; Peng, Julie B.; Ryan, Elizabeth (CRT); Cooper, David (CRT); spencer.fisher@usdoj.gov; Catherine.meza@usdoj.gov; AllisonRiggs@southerncoalition.org; AnitaEarls@southerncoalition.org; \*AStein@tinfulton.com; Christopher Brook; dale.ho@aclu.org; \*dlieberman@advancementproject.org; gill.beck@usdoj.gov; \*ijoyner@NCCU.EDU; jebenstein@aclu.org; LMcDonald@aclu.org; \*phair@advancementproject.org; John.Russ@usdoj.gov; jdevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Wu, Jodi  
**Subject:** NAACP v. McCrory/LWV v. NC/U.S. v. NC: Plaintiffs' Second Set of Document Numbers  
**Attachments:** 20140321 Pls' Second List of Control IDs.xlsx

Counsel,

On behalf of Plaintiffs' counsel and pursuant to Section 2(b)(2) of the Court's March 3, 2014 Order in these matters, attached please find Plaintiffs' second list of control IDs reflecting the emails and other electronic records that Plaintiffs have identified as responsive to their discovery requests.

I also write to inquire as to the production status of Plaintiffs' first list of control IDs submitted to you on March 14, 2014. Pursuant to Section 2(b)(2) of the Court's Order, "Defendants shall have five business days to identify any of those emails or other electronic records that they may believe are not responsive or protected by the attorney-client privilege, the work product doctrine or legislative privilege or immunity." Please advise as to whether you will be producing this information today for the first 3,000 emails or other electronic records that Plaintiffs identified as responsive, consistent with the Court's Order. Please further advise as to whether we can expect to receive this same information for each additional set of 1,000 documents next week as provided for under the Court's Order.

Thank you.

Kimberly D. Rancour | Kirkland & Ellis LLP  
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202-879-5931(Direct) | 202-879-5200 (Fax)

[kimberly.rancour@kirkland.com](mailto:kimberly.rancour@kirkland.com)

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**From:** Wu, Jodi  
**Sent:** Friday, March 14, 2014 6:01 PM  
**To:** [phil.strach@ogletreedeakins.com](mailto:phil.strach@ogletreedeakins.com); [Amy.Pocklington@ogletreedeakins.com](mailto:Amy.Pocklington@ogletreedeakins.com); [thomas.farr@ogletreedeakins.com](mailto:thomas.farr@ogletreedeakins.com); [apeters@ncdoj.gov](mailto:apeters@ncdoj.gov); [butch@butchbowers.com](mailto:butch@butchbowers.com); [bob.stephens@nc.gov](mailto:bob.stephens@nc.gov)  
**Cc:** Donovan, Daniel T.; O'Connor, Bridget K.; Allen, Winn; Peng, Julie B.; Rancour, Kimberly D.; Ryan, Elizabeth (CRT); Cooper, David (CRT); [spencer.fisher@usdoj.gov](mailto:spencer.fisher@usdoj.gov); [Catherine.meza@usdoj.gov](mailto:Catherine.meza@usdoj.gov); [AllisonRiggs@southerncoalition.org](mailto:AllisonRiggs@southerncoalition.org); [AnitaEarls@southerncoalition.org](mailto:AnitaEarls@southerncoalition.org); [\\*AStein@tinfulton.com](mailto:*AStein@tinfulton.com); Christopher Brook; [dale.ho@aclu.org](mailto:dale.ho@aclu.org); [\\*dlieberman@advancementproject.org](mailto:*dlieberman@advancementproject.org); [gill.beck@usdoj.gov](mailto:gill.beck@usdoj.gov); [\\*ijoyner@NCCU.EDU](mailto:*ijoyner@NCCU.EDU); [jebenstein@aclu.org](mailto:jebenstein@aclu.org);

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[melias@perkinscoie.com](mailto:melias@perkinscoie.com); [efrost@perkinscoie.com](mailto:efrost@perkinscoie.com)

**Subject:** Plaintiffs' First List of Document Numbers

Counsel,

On behalf of Plaintiffs' counsel and pursuant to the March 3, 2014 Order, Section 2(b)(2), please find attached a list of control IDs that have been marked for production. Please let me know if you have any questions.

Thank you,  
Jodi

Jodi Wu  
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