

EXHIBIT C

Gray, J. Ryan (78731)

From: Gray, J. Ryan (78731) <jrgray@michaelbest.com>
Sent: Friday, January 14, 2022 2:23 PM
To: Chris Blake
Cc: Albridge III, Kenneth M (23067); Scheller, John C (22276); Martin Warf; John McElwaine; Bess, Michael D (35827)
Subject: RE: Beringer Commerce, Inc. v. Fin Cap, Inc., Blue Acorn PPP, LLC, and Blue Oak Forest, LLC | Case No. 5:21-CV-251-BO | Plaintiff's Discovery Responses

We disagree with your assessment. Let us know when you are available next week for a meet and confer regarding this. We are available Wednesday after 12 PM and generally available Thursday and Friday.

J. Ryan Gray

Associate Attorney
T 984.220.8731 | M 443.910.4186
jrgray@michaelbest.com | bio



From: Chris Blake <chris.blake@nelsonmullins.com>
Sent: Thursday, January 13, 2022 2:50 PM
To: Gray, J. Ryan (78731) <jrgray@michaelbest.com>
Cc: Albridge III, Kenneth M (23067) <kmalbridge@michaelbest.com>; Scheller, John C (22276) <JCScheller@michaelbest.com>; Martin Warf <martin.warf@nelsonmullins.com>; John McElwaine <john.mcelwaine@nelsonmullins.com>; Bess, Michael D (35827) <mdbess@michaelbest.com>
Subject: RE: Beringer Commerce, Inc. v. Fin Cap, Inc., Blue Acorn PPP, LLC, and Blue Oak Forest, LLC | Case No. 5:21-CV-251-BO | Plaintiff's Discovery Responses

Ryan,

We don't agree that a two-tier protective is needed in this case. Our clients conduct business in different spaces and are not in competition for the same customers. Moreover, we will need to review and evaluate plaintiff's information produced in discovery with our client in order to defend the claims in this case, and an "attorneys eyes only" designation will hamper our ability to do that. As a result, a single "confidential" designation is sufficient without an "attorneys eyes only" designation. Please send a revised protective order without the "attorneys eyes only" provisions.

Thanks.

CHRISTOPHER J. BLAKE PARTNER
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4140 PARKLAKE AVENUE | RALEIGH, NC 27612

From: Gray, J. Ryan (78731) <jrgray@michaelbest.com>
Sent: Wednesday, January 12, 2022 1:45 PM
To: Chris Blake <chris.blake@nelsonmullins.com>
Cc: Albridge III, Kenneth M (23067) <kmalbridge@michaelbest.com>; Scheller, John C (22276) <JCScheller@michaelbest.com>; Martin Warf <martin.warf@nelsonmullins.com>; John McElwaine <john.mcelwaine@nelsonmullins.com>; Bess, Michael D (35827) <mdbess@michaelbest.com>
Subject: RE: Beringer Commerce, Inc. v. Fin Cap, Inc., Blue Acorn PPP, LLC, and Blue Oak Forest, LLC | Case No. 5:21-CV-251-BO | Plaintiff's Discovery Responses

Chris,

I attach a proposed protective order for your review. Let us know your thoughts.

Best regards,
Ryan

J. Ryan Gray
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From: Chris Blake <chris.blake@nelsonmullins.com>
Sent: Tuesday, January 11, 2022 3:28 PM
To: Gray, J. Ryan (78731) <jrgray@michaelbest.com>
Cc: Albridge III, Kenneth M (23067) <kmalbridge@michaelbest.com>; Scheller, John C (22276) <JCScheller@michaelbest.com>; Martin Warf <martin.warf@nelsonmullins.com>; John McElwaine <john.mcelwaine@nelsonmullins.com>
Subject: RE: Beringer Commerce, Inc. v. Fin Cap, Inc., Blue Acorn PPP, LLC, and Blue Oak Forest, LLC | Case No. 5:21-CV-251-BO | Plaintiff's Discovery Responses

Ryan,

We will have some issues to raise with these discovery responses that will be addressed in a separate letter, and we are reserving our right to address those issues. In the meantime: (1) can you please give us an idea when Plaintiff will be producing documents; and (2) if you have a simple and straightforward protective order you would like to propose for confidential business information, please forward your proposed protective order so that we may review it and respond with any comments/revisions.

Regards,

CHRISTOPHER J. BLAKE **PARTNER**

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From: Gray, J. Ryan (78731) <jrgray@michaelbest.com>

Sent: Monday, January 10, 2022 6:15 PM

To: Chris Blake <chris.blake@nelsonmullins.com>; Martin Warf <martin.warf@nelsonmullins.com>

Cc: Albridge III, Kenneth M (23067) <kmalbridge@michaelbest.com>; Scheller, John C (22276)

<JCScheller@michaelbest.com>

Subject: Beringer Commerce, Inc. v. Fin Cap, Inc., Blue Acorn PPP, LLC, and Blue Oak Forest, LLC | Case No. 5:21-CV-251-BO | Plaintiff's Discovery Responses

◀**External Email**▶ - From: jrgray@michaelbest.com

Counsel:

Attached please find Plaintiff's Answers to Defendants' First Set of Interrogatories and First Set of Requests for Production. Plaintiff's document production and verification are forthcoming.

Best regards,
Ryan

J. Ryan Gray

Associate Attorney

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Michael Best · A [LexMundi](#) Member

Michael Best & Friedrich LLP

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