

EXHIBIT C

Burruss, Chesley

From: Pratt, Marcel S.
Sent: Tuesday, March 11, 2025 5:30 PM
To: Lawrence J. Lederer
Cc: Rogers, Edward; Burruss, Chesley; Gallagher, Thomas J.; Daniel Arellano; Roy Herrera; jillian@ha-firm.com; Bart D. Cohen; Michael L. Murphy; Justin A. Heller; Matthew M. Zapala; Gabriel R. Dos Santos; Beatriz Aguirre; Watson, Travis W.
Subject: RE: Prestamos - Plaintiffs' 30(b)(6) Notice of Deposition
Attachments: 2025.03.11 Responses and Objections to Rule 30(b)(6) Notice 4900-8285-2901.pdf

Larry:

In response to your most recent and earlier emails:

1. Attached please find Prestamos's objections to Plaintiffs' Rule 30(b)(6) notice (the "Objections").
2. After discussing your initial proposal with our client, Prestamos will agree to produce Jose Martinez on a single date to testify as a Rule 30(b)(1) and Rule 30(b)(6) witness, subject to the Objections. We will work on providing dates for a virtual deposition.
3. Prestamos is not agreeing to produce David Castillo as a witness, in any capacity. You made a proposal that explicitly waived a deposition of Mr. Castillo, and gave us a unilateral deadline of March 12 (tomorrow) to respond to that proposal. Rather than give us the opportunity to meet your deadline, you revoked the proposal and have now asked for Mr. Castillo's deposition on the ground that we have not responded to your 30(b)(6) topics. With this email, we are responding to your topics and offering to produce Mr. Martinez to testify to all of them, as stated above. Accordingly, we assume you will withdraw your request for Mr. Castillo's deposition and if you do not do so, we will regard your latest proposal as not being made in good faith.
4. We are willing to meet and confer this week.

Best,
Marcel

Marcel S. Pratt
He/Him/His

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