

EXHIBIT C

From: [Lauren E Martin](#)
To: [Jessica Phillips](#); [Annelise Corriveau](#); [France Svistovski](#); [Stameshkin, Liz](#); [Angela L. Dunning](#); [Karen Dunn](#); [Ghajar, Bobby A.](#); [Weinstein, Mark](#); [Hartnett, Kathleen](#); [Morton, Phillip](#)
Cc: [AI_Copyright_Team@fnf.law](#)
Subject: RE: Cambronne, Cognella, Chicken Soup: Discovery response deficiencies
Date: Thursday, July 9, 2026 5:40:00 PM

Jessica and team,

Thank you for meeting with us yesterday to discuss the outstanding discovery issues. Following up on a few items from our discussion:

First, the Meta individual identified in the initial disclosures who does not appear to have been treated as a custodian for purposes of document search and production is Annie Franco.

Second, we discussed a brief extension of the discovery deadlines for *Cognella* and *Chicken Soup*, which are currently July 13 and July 15, respectively. Because *Cambronne* discovery is due on Monday, July 20, we propose providing discovery for all three matters on that date. Please let us know whether July 20 is agreeable for all three cases.

Finally, as we prepare for the upcoming depositions, could you please produce the documents responsive to RFP No. 1 that you agreed to provide, subject to the protective order, without waiting for entry of the ESI order? It would be helpful to receive those materials—including the unredacted summary judgment briefing and related materials from *Kadrey*—by the end of this week.

Many thanks –

Elle

Lauren E. Martin
Counsel



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From: Jessica Phillips

Sent: Tuesday, July 7, 2026 1:18 PM

To: Lauren E Martin ; Annelise Corriveau ; France Svistovski ; Stameshkin, Liz ; Angela L. Dunning ; Karen Dunn ; Ghajar, Bobby A. ; Weinstein, Mark ; Hartnett, Kathleen ; Morton, Phillip

Cc: [AI_Copyright_Team@fnf.law](#)

Subject: RE: Cambronne, Cognella, Chicken Soup: Discovery response deficiencies

[External Email]

Elle,

We can do 5 pm ET tomorrow. Thank you. Will you send an invite? Please include me, Phil Morton, Liz Stameshkin, and Christine Ray.

Thank you,

Jessica

From: Lauren E Martin <lmartin@stris.com>

Sent: Tuesday, July 7, 2026 3:10 PM

To: Jessica Phillips <jphillips@dirllp.com>; Annelise Corriveau <acorriveau@dirllp.com>; France Svistovski <FSvistovski@dirllp.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Karen Dunn <KDunn@dirllp.com>; Ghajar, Bobby A.

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Hi Jessica,

Our team is available tomorrow at 2:15 ET or again at 5pm ET.

Lauren E. Martin
Counsel



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From: Jessica Phillips <JPhillips@dirllp.com>

Sent: Tuesday, July 7, 2026 9:12 AM

To: Lauren E Martin <lmartin@stris.com>; Annelise Corriveau <acorriveau@dirllp.com>; France Svistovski <FSvistovski@dirllp.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Karen Dunn <KDunn@dirllp.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Hartnett, Kathleen <khartnett@cooley.com>; Morton, Phillip <pmorton@cooley.com>

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Subject: RE: Cambronne, Cognella, Chicken Soup: Discovery response deficiencies

[External Email]

Elle,

Please let us know if you have availability to meet and confer tomorrow regarding your letter from June 30 and our letter from June 24.

Best,

Jessica

From: Lauren E Martin <lmartin@stris.com>

Sent: Tuesday, June 30, 2026 7:28 PM

To: Jessica Phillips <JPhillips@dirllp.com>; Annelise Corriveau <acorriveau@dirllp.com>; France Svistovski <FSvistovski@dirllp.com>; Stameshkin, Liz <lstameshkin@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Karen Dunn <KDunn@dirllp.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Hartnett, Kathleen <khartnett@cooley.com>; Morton, Phillip <pmorton@cooley.com>

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Jessica,

Please see the attached correspondence regarding Meta's discovery responses.

In addition, we await resolution of the technical issues that persist with your May 27, 2026, production of documents from the *Kadrey* matter (META_CCC_VOL001, META_KADRE_CCC_VOL001, and META_KADRE_CCC_VOL002) that have precluded us from full access to those files for over a month. We also await the discovery log requested by email on June 5 and then again last week during our call on June 23 that gives a general description of what the data is and what it was in response to. Liz Stameshkin and Phil Morton mentioned, for example, that a tranche of the data in those volumes had been produced to the plaintiffs in *Kadrey* but that it wasn't in response to a formal discovery request and may have been produced in light of discussions Meta's counsel had with plaintiffs' counsel in that case.

Of course, for data like that, we likely will have no insight into the data's origin or reason it was produced.

Lastly, please let us know when to expect productions from *Entrepreneur Media*.

Best,

Elle

Lauren E. Martin
Counsel



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