

EXHIBIT C

MUNGER, TOLLES & OLSON LLP

560 MISSION STREET
TWENTY-SEVENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-2907
TELEPHONE (415) 512-4000
FACSIMILE (415) 512-4077

355 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-1560
TELEPHONE (213) 683-9100
FACSIMILE (213) 687-3702

December 30, 2014

RONALD L. OLSON¹
ROBERT E. DENHAM
JEFFREY I. WEINBERGER
CARY B. LERMAN
GREGORY P. STONE
BRAD D. BRIAN
BRADLEY S. PHILLIPS
GEORGE M. GARVEY
WILLIAM D. TEMKO
STEPHEN M. KRISTOVICH
JOHN W. SPIEGEL
TERRY E. SANCHEZ
STEVEN M. PERRY
MARK B. HELM
JOSEPH D. LEE
MICHAEL R. DOYEN
MICHAEL E. SOLOFF
GREGORY D. PHILLIPS
KATHLEEN M. McDOWELL
GLENN D. POMERANTZ
THOMAS B. WALPER
PATRICK J. CAFFERTY, JR.
JAY M. FUJITANI
O'MALLEY M. MILLER
SANDRA A. SEVILLE-JONES
MARK H. EPSTEIN
HENRY WEISSMANN
KEVIN S. ALLRED
BART H. WILLIAMS
JEFFREY A. HEINTZ
JUDITH T. KITANO
KRISTIN LINSLEY MYLES
MARC T.G. DWORSKY
JEROME C. ROTH
STEPHEN D. ROSE
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GARTH T. VINCENT
TED DANE
STUART N. SENATOR
MARTIN D. BERN
DANIEL P. COLLINS
ROBERT L. DELL ANGELO
BRUCE A. ABBOTT
JONATHAN E. ALTMAN
MARY ANN TODD
MICHAEL J. O'SULLIVAN
KELLY M. KLAUS
DAVID B. GOLDMAN
KEVIN S. MASUDA
HOJOON HWANG

PETER A. DETRE
DAVID H. FRY
LISA J. DEMSKY
MALCOLM A. HEINICKE
GREGORY J. WEINGART
TAMERLIN J. GODLEY
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CAROLYN HOECKER LUEDTKE
C. DAVID LEE
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BRETT J. RODDA
SEAN ESKOVITZ
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BLANCA FROMM YOUNG
RANDALL G. SOMMER
MARIA SEFERIAN
MANUEL F. CACHAN
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TODD J. ROSEN
TRUC T. DO
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GRANT A. DAVIS-DENNY
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DANIEL B. LEVIN
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KATHERINE KU
HAILYN J. CHEN
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KIMBERLY A. CHI
JACOB S. KREILKAMP
ERIC P. TUTTLE
HEATHER E. TAKAHASHI
KEITH R.D. HAMILTON, II
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JEFFREY Y. WU
ALISSA BRANHAM
ADAM R. LAWTON
JENNY H. HONG
AARON SEIJI LOWENSTEIN
LAURA D. SMOLOWE
MATTHEW A. MACDONALD
MARGARET G. MARASCHINO

¹A PROFESSIONAL CORPORATION

ESTHER H. SUNG
BENJAMIN J. MARO
MICHAEL A. MONGAN
KYLE A. CASAZZA
ERIN J. COX
CLAIRE YAN
ALLISON S. WOODS
JESLYN A. MILLER
MARK R. SAYSON
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JEREMY A. LAWRENCE
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AMELIA L.B. SARGENT
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ERIC K. CHIU
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JESSICA BARCLAY-STROBEL
ZACHARY M. BRIERS
JENNIFER M. BRODER
CHRISTINA P. MONIODIS
JOHN P. MITTELBACH
SARAH GARBER
SAMUEL T. GREENBERG
CAROLINE M. M'KAY
EMILY B. VIGLIETTA
WILLIAM J. EDELMAN
KEVIN L. BRADY
EMILY R.D. MURPHY
ELLEN MEDLIN RICHMOND

NICOLE S. PHILLIS
JORDAN D. SEGALL
DANIEL J. HARRIS
VICTORIA A. DEGTYAREVA
WESLEY T.L. BURRELL
CHRISTA L. CULVER
ANYA J. GOLDSTEIN
KAREN A. LORANG
KURUVILLA J. OLASA
KEVIN H. SCOTT
JUSTIN P. RAPHAEL
HANNAH E. SHEARER
ELIA HERRERA
ROBERT W. GRAY, JR.
THOMAS P. CLANCY
JOSHUA PATASHNIK
ERIC C. TUNG
GUHA KRISHNAMURTHI
JOSHUA S. MELTZER
SARA E. CROLL
ANDREW G. PROUT
THANE REHN
ADAM B. WEISS
ROSE LEDA EHLER
AMY L. GREYWITT
ANDREW Z. WOLSTAN
NASSIM NAZEMI

OF COUNSEL
RICHARD D. ESBENSHADE¹
ROBERT K. JOHNSON¹
ALAN V. FRIEDMAN¹
RONALD K. MEYER
ALLISON B. STEIN
SUSAN E. NASH
WILLIANA CHANG
MIRANDA KANE
BRAD SCHNEIDER

E. LEROY TOLLES
(1922-2008)

WRITER'S DIRECT LINE
(415) 512-4073
(415) 644-6973 FAX
Thane.Rehn@mto.com

Andrew P. Bridges, Esq.
Fenwick & West LLP
555 California Street, 12th Floor
San Francisco, California 94104
abridges@fenwick.com

Via E-mail

Re: ASTM, et al. v. Public.Resource.Org – 30(b)(6) Topics

Dear Mr. Bridges:

This letter responds to the issues raised in your letter of December 26. As we stated in our December 23 telephone call with you, NFPA's position is that the topics proposed by Public Resource are overly broad. Nonetheless, NFPA has agreed to provide a witness to testify about most of these topics insofar as it is practicable for a single corporate representative to do so, subject to the objections served by NFPA. We provide more specific replies below to your inquiries regarding some of the topics.

Please confirm this week that the individual deposition of Jim Pauley and the 30(b)(6) depositions of Bruce Mullen, Chris Dubay and Don Bliss will go forward in Boston on the dates proposed in our December 19 email.

Physical Inspection of Assignment Forms

Your December 26 letter raises several questions about the physical inspection of NFPA records containing assignment forms for the standards at issue in this case. I provided some

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preliminary answers to those questions in an email to you on December 23, but I have some further information available now. NFPA has expended significant effort to gather these records and make them available for inspection at its headquarters. There are approximately 120 boxes of records, and there are approximately 20 rolls of microfilm. In addition, we have figured out a way to identify which boxes do not contain assignment forms, so fewer than half of the boxes would need to be inspected. NFPA is not willing to have the records taken offsite, but NFPA can provide copying services at a rate of \$0.25 per page and \$100 per hour, which is the standard rate charged in NFPA's library.

Due to holiday schedules and office closures, there are no days this week that we can make the records available. We can make the records available on January 5, or any business day thereafter. To ensure that we can have them accessible for you when you come to inspect them, please provide us with two business days' notice.

30(b)(6) notice topics

Topic 1: As we discussed, NFPA will designate Chris Dubay to testify on the topic of the standards development process for the standards at issue. Mr. Dubay is familiar with NFPA's standards development process for the standards at issue, and has served on multiple standards development committees.

Topic 2: NFPA will designate Chris Dubay to testify on the topic of NFPA's ownership of copyright in the standards at issue. Mr. Dubay will be prepared to answer questions about how NFPA receives and assures completeness of copyright assignments. We do not agree with the legal assertions in your December 26 letter regarding what evidence is necessary or sufficient to show copyright ownership.

Topic 3: This topic asks NFPA to designate a witness to provide legal opinions regarding the authority of persons outside NFPA to assign copyrights. We do not believe it is an appropriate topic.

Topic 4: NFPA will designate a witness to testify about the ways in which it makes the standards available to the general public, subject to the objections served by NFPA.

Topic 5: NFPA has produced the terms of access to its standards, and will designate a witness to testify regarding these terms, subject to the objections served by NFPA. In particular, NFPA objects that the terms of access are legal documents and NFPA will not designate a witness to provide legal opinions regarding the meaning of these terms.

Topic 7: NFPA will designate Bruce Mullen to testify regarding its revenues from the standards at issue in this case. NFPA has taken the position throughout this litigation that it will not produce sales data beyond its audited financial statements, and Public Resource has accepted that this production is sufficient. Accordingly, Mr. Mullen will be prepared to testify generally about NFPA revenues from sales of the standards at issue, but not about the precise amount of sales to each individual government agency.

