

Exhibit C

From: David Imamura

Sent: Wednesday, July 31, 2024 5:05 PM

To: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>

Cc: Jaccard, Anais M. <Anais.Jaccard@troutman.com>; Robert Spolzino <RSpolzino@Abramslaw.com>; Jeffrey Cohen <JCohen@Abramslaw.com>; O'Donnell, Kaitlin L. <Kaitlin.O'Donnell@troutman.com>; Kent, Paris L. <Paris.Kent@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Keith Corso <KCorso@Abramslaw.com>; Steven Still <SStill@Abramslaw.com>; Tseytlin, Misha <Misha.Tseytlin@troutman.com>

Subject: RE: Clarke v. Town of Newburgh, EF002460-2024 - Plaintiffs' Deposition Dates

Counsel,

See attached an updated notice to the Town including the topics of deposition.

David

David Imamura, Esq. | Partner



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From: Moskowitz, Bennet J. <Bennet.Moskowitz@troutman.com>
Sent: Monday, July 22, 2024 6:08 PM
To: David Imamura <DImamura@Abramslaw.com>
Cc: Jaccard, Anais M. <Anais.Jaccard@troutman.com>; Robert Spolzino <RSpolzino@Abramslaw.com>; Jeffrey Cohen <JCohen@Abramslaw.com>; O'Donnell, Kaitlin L. <Kaitlin.O'Donnell@troutman.com>; Kent, Paris L. <Paris.Kent@troutman.com>; DiRago, Molly <Molly.DiRago@troutman.com>; Keith Corso <KCorso@Abramslaw.com>; Steven Still <SStill@Abramslaw.com>; Tseytlin, Misha <Misha.Tseytlin@troutman.com>
Subject: RE: Clarke v. Town of Newburgh, EF002460-2024 - Plaintiffs' Deposition Dates

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Hi David,

Can you please send us your proposed Town depo topics at your earliest convenience? Only then can we advise on which deponents may testify as to which topics. Thanks!

On July 22, 2024 at 5:54:24 PM EDT, David Imamura <DImamura@Abramslaw.com> wrote:

Paris, My mistake, yes Mr. Reed's deposition was moved to the 22nd. These dates are indeed accurate. We will get back to you on these Town Board depositions. Is there one Town Board member that you will be designating as the witness for the

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Paris,

My mistake, yes Mr. Reed's deposition was moved to the 22nd. These dates are indeed accurate. We will get back to you on these Town Board depositions. Is there one Town Board member that you will be designating as the witness for the Town?

David

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