

Exhibit C



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Via E-mail

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Re: Network-1 Technologies, Inc. v. Google LLC, et al., Nos. 1:14-cv-2396-PGG-SN & 1:14-cv-9558-PGG-SN

Dear Melissa:

On February 19, 2021 Defendants served supplemental interrogatory responses in the above-captioned cases. You indicated in your email of the same date that Defendants “are in the process of identifying relevant documents and will produce them when they are available” and “are prepared to make available a corporate representative for 30(b)(6) testimony” on topics related to these interrogatory responses and the forthcoming document production.

As you know, fact discovery closed more than a year ago on November 1, 2019. Dkt. No. 139 (Case No. 1:14-cv-2396-PGG-SN). Defendants cannot unilaterally re-open discovery. Nor can Network-1 grant permission for Defendants to do so. Defendants need to seek leave from the Court and make a showing of good cause. Because Defendants have not done so, the February 19, 2021 interrogatory responses and any subsequent production are not a part of these cases.

Best regards,

/s/ Amy E. Hayden

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