

Exhibit C

From: Ivana.Dukanovic@lw.com
To: Porter, Andrew; Blake.Steinberg@weil.com; Miller, Atara; Britt.Lovejoy@lw.com
Cc: benjamin.marks@weil.com; Todd.Larson@weil.com
Subject: [EXT] RE: Web VI Mutual Exchange
Date: Saturday, September 14, 2024 11:55:32 AM
Attachments: [image001.jpg](#)

Works for NAB as well

From: Porter, Andrew <APorter@milbank.com>
Date: Saturday, Sep 14, 2024 at 5:34 AM
To: Steinberg, Blake <Blake.Steinberg@weil.com>, Dukanovic, Ivana (Bay Area) <Ivana.Dukanovic@lw.com>, Miller, Atara <AMiller@milbank.com>, Lovejoy, Britt (Bay Area) <Britt.Lovejoy@lw.com>
Cc: Marks, Benjamin <benjamin.marks@weil.com>, Larson, Todd <Todd.Larson@weil.com>
Subject: Re: Web VI Mutual Exchange

That works for SX.

Andrew Porter | [Milbank](#) | Special Counsel
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From: Steinberg, Blake <Blake.Steinberg@weil.com>
Sent: Saturday, September 14, 2024 8:30:41 AM
To: Porter, Andrew <APorter@milbank.com>; Ivana.Dukanovic@lw.com <Ivana.Dukanovic@lw.com>; Miller, Atara <AMiller@milbank.com>; Britt.Lovejoy@lw.com <Britt.Lovejoy@lw.com>
Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>
Subject: [EXT] RE: Web VI Mutual Exchange

We're glad to exchange at a later time. Would 1pm eastern work?



Blake Steinberg
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From: Porter, Andrew <APorter@milbank.com>
Sent: Saturday, September 14, 2024 12:15 AM
To: Ivana.Dukanovic@lw.com; Steinberg, Blake <Blake.Steinberg@weil.com>; Miller, Atara <AMiller@milbank.com>; Britt.Lovejoy@lw.com
Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>
Subject: RE: Web VI Mutual Exchange

All,

We had a crash in our expert report file that we were applying proposed redactions in. We're going to put in a request to the CRB to address the late submission, but in a demonstration of completeness I've attached Volume 1 of our submission and a final text version of our expert report here.

Andrew

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From: Ivana.Dukanovic@lw.com <Ivana.Dukanovic@lw.com>
Sent: Friday, September 13, 2024 11:29 PM
To: Blake.Steinberg@weil.com; Porter, Andrew <APorter@milbank.com>; Miller, Atara <AMiller@milbank.com>; Britt.Lovejoy@lw.com
Cc: benjamin.marks@weil.com; Todd.Larson@weil.com
Subject: [EXT] RE: Web VI Mutual Exchange

Sorry in my haste did not see the proposal was to exchange at 9 am ET. Can we make it a little more bearable for us west coasters?

Ivana Dukanovic

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From: Steinberg, Blake <Blake.Steinberg@weil.com>
Sent: Friday, September 13, 2024 5:56 PM
To: Porter, Andrew <APorter@milbank.com>; Dukanovic, Ivana (Bay Area) <Ivana.Dukanovic@lw.com>; Miller, Atara <AMiller@milbank.com>; Lovejoy, Britt (Bay Area) <Britt.Lovejoy@lw.com>

Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>
Subject: RE: Web VI Mutual Exchange

Hi Andrew – just following up on whether you had a sense of timing for this. Thanks.



Blake Steinberg

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From: Porter, Andrew <APorter@milbank.com>
Sent: Friday, September 13, 2024 6:30 PM
To: Ivana.Dukanovic@lw.com; Steinberg, Blake <Blake.Steinberg@weil.com>; Miller, Atara <AMiller@milbank.com>; Britt.Lovejoy@lw.com
Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>
Subject: RE: Web VI Mutual Exchange

We should offer this to everyone who is not George and Word Collections. I'm fine with an exchange but let me coordinate with my team on time.

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From: Ivana.Dukanovic@lw.com <Ivana.Dukanovic@lw.com>
Sent: Friday, September 13, 2024 6:12 PM
To: Blake.Steinberg@weil.com; Porter, Andrew <APorter@milbank.com>; Miller, Atara <AMiller@milbank.com>; Britt.Lovejoy@lw.com
Cc: benjamin.marks@weil.com; Todd.Larson@weil.com
Subject: [EXT] RE: Web VI Mutual Exchange

That is our understanding as well. We are fine with the exchange proposed by Blake to avoid the lag.

Ivana

Ivana Dukanovic

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From: Steinberg, Blake <Blake.Steinberg@weil.com>

Sent: Friday, September 13, 2024 8:44 AM

To: Porter, Andrew <APorter@milbank.com>; Miller, Atara <AMiller@milbank.com>; Dukanovic, Ivana (Bay Area) <Ivana.Dukanovic@lw.com>; Lovejoy, Britt (Bay Area) <Britt.Lovejoy@lw.com>

Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>

Subject: RE: Web VI Mutual Exchange

Hi Andrew,

My understanding is that the submissions may not be immediately released to counsel upon filing. For example, when Word Collections filed their opposition to the protective order motion, their opposition only became available to us on the Monday after they had filed on a Friday. The goal here would be to avoid that lag.

Thanks,
Blake



Blake Steinberg

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From: Porter, Andrew <APorter@milbank.com>

Sent: Friday, September 13, 2024 11:31 AM

To: Steinberg, Blake <Blake.Steinberg@weil.com>; Miller, Atara <AMiller@milbank.com>;

Ivana.Dukanovic@lw.com; Britt.Lovejoy@lw.com

Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>

Subject: RE: Web VI Mutual Exchange

Blake – thanks for reaching out. It'd be helpful to clarify what you have in mind. My understanding (which may be wrong) is that filing restricted documents through the eCRB system will distribute the files to outside counsel who have filed notices of appearance. Is that yours as well? Is the purpose of courtesy copies to get around the lag where a late filing might not be released until Monday? Or is this to address confidentiality issues given the presence of WC and George Johnson?

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From: Steinberg, Blake <Blake.Steinberg@weil.com>

Sent: Friday, September 13, 2024 11:23 AM

To: Porter, Andrew <APorter@milbank.com>; Miller, Atara <AMiller@milbank.com>;
Ivana.Dukanovic@lw.com; Britt.Lovejoy@lw.com

Cc: Marks, Benjamin <benjamin.marks@weil.com>; Larson, Todd <Todd.Larson@weil.com>

Subject: [EXT] Web VI Mutual Exchange

Hi all,

We wanted to reach to see what you were thinking as far as a time for mutually exchanging courtesy copies of our written direct submissions. We'd propose exchanging our submissions by 9am ET tomorrow morning. Please let us know if that would be agreeable to you.

Thanks,

Blake



Blake Steinberg

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Proof of Delivery

I hereby certify that on Monday, September 23, 2024, I provided a true and correct copy of the Ex. C – Email from I. Dukanovic re Web VI Mutual Exchange, dated 9/14/2014 11:55a.m. to the following:

College Broadcasters, Inc., represented by Seth D. Greenstein, served via E-Service at sgreenstein@constantinecannon.com

Educational Media Foundation, represented by Keenan P Adamchak, served via E-Service at kadamchak@wbklaw.com

George Johnson dba Geo Music, represented by George D Johnson, served via E-Service at george@georgejohnson.com

National Religious Broadcasters Music License Committee, represented by Karyn K Ablin, served via E-Service at ablin@fhhlaw.com

Public Broadcasting Entities, represented by David P Mattern, served via E-Service at dmattern@kslaw.com

Sirius XM Radio LLC/Pandora Media LLC, represented by Todd Larson, served via E-Service at todd.larson@weil.com

SoundExchange, Inc., represented by Steven R. Englund, served via E-Service at SEnglund@jenner.com

The National Association of Broadcasters, represented by Joseph R. Wetzel, served via E-Service at joe.wetzel@lw.com

Word Collections, Inc., represented by Eric B Goldberg, served via E-Service at eric@wordcollections.com

Signed: /s/ Andrew Porter