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1300 Washington Square
100 Washington Avenue South
Minneapolis, Minnesota 55401
T (612) 337-6100 F (612) 339-6591
siegelbrill.com

SIEGEL BRILL
GREUPNER DUFFY
& FOSTER P.A.

JERRIE M. HAYES
612-337-6142
jerriehayes@sbgdf.com

May 27, 2008

VIA FAX & U.S. MAIL

Mr. Robert Pickle
1354 County Highway 21
Halstad, MN 56548

**Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.
Gailon Arthur Joy and Robert Pickle
Court Docket No. 07-40098-FDS
Our File No. 24,681-D-002**

Dear Mr. Pickle:

I write concerning your undated correspondence seeking a discovery conference related to the MidCountry Bank production and related to your potential filing of confidential 26(a)(1) documents produced by Plaintiffs. I am available any of the following dates and times for such a teleconference:

- Thursday, May 29 - 3:00 p.m., 3:30 p.m. or 4:00 p.m.
- Tuesday, June 3 - 10:00 a.m., 11:00 a.m. or 3:00 p.m.
- Wednesday, June 4 - 9:30 a.m., 10:00 a.m. or 3:30 p.m.

Please let me know which date and time you choose, and I will advise you of the telephone number where I will be reachable during that time.

I also write concerning Plaintiff's production of documents in response to Mr. Pickle's Requests for Production of Documents. In light of the overwhelming volume of information implicated by the Requests, much of which is extremely sensitive and highly confidential, Plaintiffs intend to produce relevant documents according to the following schedule:

June 13, 2008 Plaintiffs will produce all relevant, non-confidential and non-privileged responsive documents.

June 20, 2008 Plaintiffs will produce all relevant, confidential documents that do not contain donor-identifying information, pursuant to the discovery protocol of Magistrate Judge Hillman's April 17 Confidentiality and Protective Order.

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June 27, 2008 Plaintiffs will produce all relevant, confidential documents containing donor-identifying information, with the donor-identifying information redacted as necessary, pursuant to the discovery protocol of Magistrate Judge Hillman's April 17 Confidentiality and Protective Order.

July 11, 2008 Plaintiffs will produce a privilege log identifying all relevant, privileged responsive documents.

These documents will be produced in CD-Rom format at no cost to Defendants. Should you require the documents in hard-copy form, please advise and we will make arrangements for Defendants' payment of copying and shipping costs.

If you have any objection to the production schedule or format described above, please advise me in writing on or before Friday, May 30, 2008.

Sincerely,

Jerrie M. Hayes

JMH/gkh

cc: Gailon Joy (via U.S. Mail)