

EXHIBIT C

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January 17, 2017

Stephen M. Medlock
Mayer Brown, LLP
1999 K Street, NW
Washington, DC 20006

Re: *Benisek v. Lamone*, No. JKB-13-3233 (D. Md.)

Dear Mr. Medlock:

Enclosed are documents in response to the subpoena served on former State Senator Robert Garagiola. We have also enclosed a privilege log indicating that one document has been withheld because it is protected under legislative privilege.

Additionally, we object to Request 1 as vague as to what would be considered "sufficient to show when [he] decided to seek" the Democratic nomination. We have provided all documents relating to former Senator Garagiola's interest in running for the Congressional Representative in the 6th District for Maryland and steps taken in preparation for doing so. Former Senator Garagiola had no documents in response to Request 6. To the best of former Senator Garagiola's recollection he was not endorsed by nor received contributions from any of the persons listed. We note that campaign finance reports showing all contributions and expenditures for former Senator Garagiola's campaign for Congress are available on the Federal Election Commission website.

In the interest of privacy, personal email addresses and phone numbers contained in produced emails have been redacted as not relevant to the issues in this case nor likely to lead to relevant evidence. In all cases, however, the name of the person who sent and/or received the email is not redacted.

Sincerely,


Sandra Benson Brantley
Counsel to the General Assembly

Benisek v. Lamone
Privilege Log for former Senator Rob Garagiola

Document No.	Date	Description	Reason for Withholding
1	7/8/2011	Email to State delegate re congressional redistricting	Legislative privilege