

EXHIBIT C

From: [Gary Wright II](#)
To: [Jamie Frawley](#)
Subject: Re: Rule 26(f) Conference Availability for Marshall County (4:22-cv-9615)?
Date: Monday, November 21, 2022 3:13:02 PM
Attachments: [image001.png](#)
[MotionToTransferVenue-filed20221121.pdf](#)

I'm sorry, it sounds like your client didn't clear with you what they were going to attempt to do to me in state court.

This morning I filed a motion to stay proceedings in this case because one or more of your clients conspired and committed felony obstruction of justice by retaliating against me in order to disrupt this case, so this is now a criminal and not a civil case.

I've notified Dept of Justice Civil Rights Division, and asked them to take over this case.

It takes a few days to hit the docket, but attached is a copy of the filing I made today in state district court to end this retaliation.

Best regards,

- Gary Wright II
103 Mayberry Lane
Arab, AL 35016
(256) 640-7749

On Mon, Nov 21, 2022 at 11:59 AM Jamie Frawley <JFrawley@wmwfirm.com> wrote:

Mr. Wright,

While I am always happy to work with opposing parties regarding dates, etc., so long as doing so does not prejudice my client, I cannot consent to an amended complaint at this point, particularly since I quite frankly do not know what you are talking about.

Without getting into the weeds of legal specifics at this point, our current R. 26 deadline is December 6. I agree that it makes sense to put off the planning meeting at least until after we are both on the same page about what claims may be at issue. When do you anticipate filing your motion?

Thank you,



Jamie Helen Kidd Frawley

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The law firm of Webb McNeill Walker Pc has moved locations. Please note our new address.

This e-mail and any attachments may contain confidential and privileged information. If you are not the intended recipient, please notify the sender immediately by return e-mail and destroy any copies. Any dissemination or use of this information by a person other than the intended recipient is unauthorized and may be illegal.

From: Gary Wright II <Gary@gary-wright.com>

Sent: Friday, November 18, 2022 11:44 AM

To: Jennifer Smith <jsmith@WMWFIRM.COM>; Jamie Frawley <JFrawley@WMWFIRM.COM>

Subject: Rule 26(f) Conference Availability for Marshall County (4:22-cv-9615)?

We have a problem. Just as I was finalizing my preliminary discovery plan, one or more of your knucklehead clients has just committed acts in furtherance of their conspiracy. SMDH!

I'm going to need to file an Amended Complaint and numerous motions in multiple courts.

Thankfully for me, your client has just kicked the door wide open for the legal discovery I will need for civil and now likely some felony criminal charges.

Let me know your schedule so we can discuss how you wish to handle this.

PS. I'm going to let you request this next delay for our conference because this one is your client's fault!

Best regards,

- Gary Wright II

103 Mayberry Lane

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