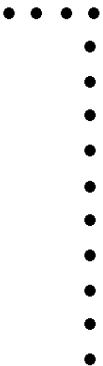


# Hall Declaration Exhibit C



• Law Offices of David M. Zeff  
• 1388 Sutter Street, Suite 820  
• San Francisco, CA 94109

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To: Victoria K. Hall  
Fax number: 1240 536 9142

From: David M. Zeff  
Fax number: 415 923 1382  
Business phone: 415 923 1380  
Home phone:

Date & Time: 7/21/2006 10:28:48 AM  
Pages: 2  
Re: Jacobsen v. KAM, et al, our file 9364

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Please see accompanying letter, also mailed to you today, in response to your letter received by fax. Please advise the Court, as part of your good faith disclosure, that I am on vacation starting tomorrow and that you were given notice of that fact in early June, 2006. Thank you.  
David M. Zeff

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July 21, 2006

Victoria K. Hall  
Law Office of Victoria K Hall  
401 N Washington St #550  
Rockville, MD 20850

Via fax to: (240) 536-9142  
and first class mail

Re: Jacobsen v. Katzer, et al., U.S. Dist. Ct., ND Cal.No. 06-1905  
Our file 9364

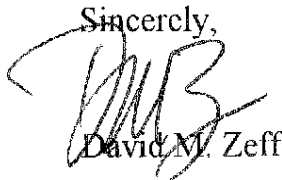
Dear Ms. Hall:

This is in response to your letter of today's date, received by fax, demanding that Mr. Russell withdraw his anti-SLAPP motion on threat of your motion for Rule 11 sanctions. I have to thank you for getting my juices flowing early today by reading that letter. I do not recall having experienced the emotions of disdain, anger and bemusement all at the same time.

After considering the full range of my possible responses, I am exercising maximum self restraint by responding as follows. Mr. Russell and I stand fully behind all of the facts and law we presented in that motion. Your threat reeks of panic, as well it should, since the motion has a overwhelming likelihood of being granted and your client being assessed our attorneys fees for the effort. The motion will not be withdrawn. Hopefully you will have the insight and self restraint to let the Court rule on the motion before you file any Rule 11 motion, but by the lights of your letter, insight and self restraint don't appear to play much of a role in your conduct of litigation.

I will be on vacation, as I advised you in writing in early June, from July 22 through July 31. As I stated in my email reply to yours this morning, if you do file anything with the Court in my absence, please make sure to provide the Court with copies of my email opposing your requests and also let the Court know that I am on vacation and unable to respond until my return.

Sincerely,



David M. Zeff

cc: Client, Mr. Jerger, via email  
DMZ:hs