EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-v-

CITY OF NEW YORK, et al.,

Defendants

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OBJECTIONS TO SUBPOENA

Civil Action No. 10-cv-6005 (RWS)

To: Suzanna Publicker Mettham
Assistant Corporation Counsel
New York City Law Department
100 Church Street
New York, NY 10007
(212) 788-1103

Graham Rayman objects to the subpoena *duces tecum* dated December 3, 2013, on the grounds below.

In response to **Demands 1 through 13, 22 and 23**, Mr. Rayman asserts the following objections:

a) **Reporter's Privilege**: The records sought are unpublished editorial and reportorial work-product and, therefore, are protected by the reporter's privilege. The production of such editorial materials would be an undue imposition upon the freedom of the press under the First Amendment of the U.S. Constitution, Article 8 of the Constitution of the State of New York, and/or any other applicable state law or rule of evidence protecting journalist newsgathering information and activities. Any need for the information is

outweighed by the public interest in protecting the editorial work product and confidential information and sources of journalists and the news media.

b) **Undue Harm and Interference**: Production of the records sought would unduly hamper Mr. Rayman's ability to function in his independent journalistic role. Among other things, were Mr. Rayman drawn into private disputes as a result of his coverage of the wide range of topics he covers, a substantial burden would be imposed on him that would hamper his ability to independently and neutrally cover important and controversial issues of importance to the public and to effectively and credibly carry out his proper editorial function.

c) **Production Unduly Burdensome**: The production of the records sought is unduly burdensome because providing such information to all third party litigants on any issue covered by Mr. Rayman would so overburden him that he would be prevented from effectively carrying out his primary function as a news reporter; moreover, the material sought cannot be located without the expenditure of unreasonable burden, time and/or cost, or it is not maintained in a manner that is subject to retrieval with reasonable cost and effort.

d) **Subpoena Calls for Documents that Are Irrelevant and Not Necessary or Essential to the Captioned Litigation**: The subpoena calls for information that is not necessary or essential to the subject litigation; not relevant to any of the claims or defenses therein; and not designed or reasonably calculated to lead to or obtain relevant or admissible evidence.

e) **Information Is Otherwise Available**: The information sought is available by other means without burdening Mr. Rayman.

In response to **Demands 14 through 21**, Mr. Rayman repeats the objections above and further asserts the following objections:

a) **Overbroad, Vague and Lacking in Reasonable Particularity**: The requests as framed are overbroad, unreasonably vague and lacking in reasonable particularity or specificity.

b) **Privileged Documents**: The subpoena is so broad that it appears to call for documents that are covered by the attorney-client or other applicable privilege.

Dated: New York, New York
January 24, 2014

MILLER KORZENIK SOMMERS LLP

By:_____
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