

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

**TALBOT 2002 UNDERWRITING CAPITAL
LTD, WHITE MOUNTAINS RE SIRIUS CAPITAL
LTD, AND MARKEL CAPITAL LIMITED,**

Plaintiffs,

v.

**Case No. 5:15-cv-12542
Honorable Irene C. Berger**

OLD WHITE CHARITIES, INC.,

Defendants.

OLD WHITE CHARITIES, INC.,

Third Party Plaintiffs,

v.

**HCC SPECIALTY UNDERWRITERS, INC., a
Massachusetts corporation; ALL RISKS, LTD.,
a Maryland corporation; and UNDERWRITERS
AT LLOYD'S LONDON, a foreign corporation**

Third Party Defendants.

OLD WHITE CHARITIES, INC.'s RULE 26(a)(1) DISCLOSURES

Defendant and Third Party Plaintiff Old White Charities, Inc. ("Old White"), by counsel, and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, hereby make the following disclosures:

A. Fed. R. Civ. P. 26(a)(1)(i) – Persons with Discoverable Information.

The following individuals may have information regarding Old White's claims and/or defenses.

1. Robin Lang, HCC Specialty Underwriters, Inc.
2. Mike Connatser, All Risks, Ltd.
3. Daniel Libby, HCC Specialty Underwriters, Inc.
4. Crystal Kelly, Bankers Insurance
5. Kevin Workman, Old White Charities, Inc.
6. Marshall Fleming, Bankers Insurance
7. Melvin Tull, Bankers Insurance
8. Kathleen Cooney, HCC Specialty Underwriters, Inc.
9. Sean Curtin, HCC Specialty Underwriters, Inc.
10. Monte Ortel, Greenbrier Classic Executive Tournament Director
11. Charlie Henthorn, Greenbrier
12. Jim Sweetwood, Greenbrier Classic Tournament Coordinator
13. Gene Hayes, Bankers Insurance
14. Paul Fleming II, Bankers Insurance
15. James T. Miller, Greenbrier
16. George McNeill, 1282 Miracle Lane, Fort Myers, Florida 33901
17. Justin Thomas, 12300 Warner Drive, Goshen, Kentucky 40026
18. Rita Antinoro, Greenbrier
19. Teresa Walker, All Risks, Ltd.
20. Andrew Haynes, All Risks, Ltd.

21. Kim Mason, All Risks, Ltd.
22. Michael Hedden, Bankers Insurance
23. All individuals named by other parties in their Rule 26(a)(1) disclosures.
24. Individuals employed by the PGA Tour organization.
25. Individuals identified or named in documents produced in discovery.
26. Old White's expert(s) (when disclosed).

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Old White reserves the right to supplement this list of witnesses as needed pursuant to ongoing discovery.

B. Fed. R. Civ. P. 26(a)(1)(ii) – Documents.

The documents attached by the parties in the various pleadings to date in this matter contain information which may be used to support Old White's claims and defenses. In addition, email and other correspondence between the parties regarding the request for insurance coverage and resulting negotiations may contain information used to support Old White's claims and defenses.

C. Fed. R. Civ. P. 26(a)(1)(iii) – Damages.

Plaintiffs seek payment under the insurance policy, interest thereon, punitive damages as determined by a jury, and their reasonable attorneys' fees, reasonable expenses, pre-judgment and post-judgment interest, and the costs of bringing this action, together with such other equitable relief as is just and proper *and* any other relief sought in the Complaint.

D. Fed. R. Civ. P. 26(a)(1)(iv) – Insurance Agreements.

None on behalf of Old White. There may be insurance agreements that cover other parties for which Plaintiffs are unaware of the details and specifics.

OLD WHITE CHARITIES, INC.,

By Counsel

/s/ Kimberly K. Parmer

Marvin W. Masters (WVSB # 2359)

Kimberly K. Parmer (WVSB # 9093)

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Old White Charities, Inc.***

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Third Party Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December, 2015, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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