

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

151 Meeting Street / Sixth Floor / Charleston, SC 29401-2239

Tel: 843.853.5200 Fax: 843.720.4353

www.nelsonmullins.com

Robert H. Jordan

Tel: 843.534.4221

Fax: 843.722.8700

robert.jordan@nelsonmullins.com

February 5, 2008

Via Process Service

William M. Campbell

1409 29th Street

Washington, D.C. 20007

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and Max Weissman Productions, Inc. d/b/a Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500

Dear Mr. Campbell:

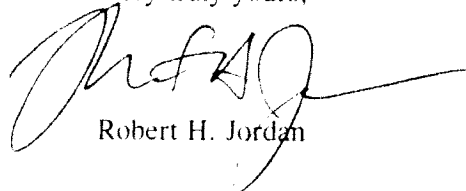
Please find enclosed for service upon you a Subpoena Duces Tecum requiring your appearance at your deposition in the above matter on **Wednesday, February 20, 2008, beginning at 10:00 a.m.**, in our office located at 101 Constitution Avenue, Suite 900, Washington, D.C. We also enclose our firm's check in the amount of \$44.00, which represents the required witness appearance fee and mileage reimbursement to which you are entitled for your appearance and testimony.

In addition, the Subpoena requires you to produce any and all records in your possession as described in the Subpoena to my attention **on or before Friday, February 15, 2008**. Of course, we are happy to reimburse you for any copying expenses associated with producing these records to us.

Please note that we have arbitrarily selected the date of your deposition. Should it be inconvenient for you, please let us know immediately and we will be happy to try and accommodate your schedule.

Your cooperation and assistance in this matter are most appreciated. Should you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Robert H. Jordan

RHJ:ll

Enclosures

cc: Frank Cisa, Esq.
Richard A. Farrier, Jr., Esq. (both with enclosure)

Exhibit C

Subpoena in a Civil Case

Issued by the UNITED STATES DISTRICT COURT

DISTRICT OF

COLUMBIA

TRADEMARK PROPERTIES, INC. et al.

V.

A&E TELEVISION NETWORKS, et al.

SUBPOENA IN A CIVIL CASE

Case Number: 2:06-cv-2195-CWH (D.S.C.)

TO: William M. Campbell, 1409 29th Street, Washington, D.C. 20007

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY: COURTROOM, DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case. Testimony will be recorded by stenographic, sound-and-visual, sound means

PLACE OF DEPOSITION: Nelson Mullins Riley & Scarborough, LLP, 101 Constitution Ave, Suite 900, Washington, DC 20001, DATE AND TIME: 2/20/2008 10:00 am

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects and indicate the form of production):

Any and all records, including documents, notes, and emails, regarding any discussions, negotiations, communications or dealings with Richard C. Davis and/or Trademark Properties, Inc., or any person acting on their behalf.

PLACE: Nelson Mullins Riley & Scarborough, LLP, ATTN: Richard A. Farrier, 101 Constitution Ave, Suite 900, Washington, DC 20001, DATE AND TIME: 2/15/2008 5:00 pm

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES: DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT): DATE: 2/5/2008

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER: Robert H. Jordan, Esq., Nelson Mullins Riley & Scarborough LLP, 151 Meeting Street/Sixth Floor, P.O. Box 1806 (29402), Charleston, SC 29401-2239, (843) 853-5200

(See Rule 45, Federal Rules of Civil Procedure, Subpoena, for details and see also page 2.)

If action is pending in district other than district of issuance, state district under case number.

Subpoena in a Civil Case

PROOF OF SERVICE

DATE

PLACE

SERVED

SERVED ON (PRINT NAME)

MANNER OF SERVICE

SERVED BY (PRINT NAME)

TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on

DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena a written objection to producing any or all of the designated materials or inspection of the premises or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (3)(B) of this rule, such a person may, in order to attend trial, be commanded to travel from any such place within the date in which the trial is held;

(iii) requires disclosure of privileged or other protected matter if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of trade secrets or other confidential information; or

(ii) requires disclosure of an unprepared expert's opinion or information not describing specific content of testimony, dispute and resulting from the expert's study made in response to any party; or

(iii) requires a person who is not a party or an officer of a party to incur a substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) (1) Failure of any person to whom a subpoena is directed to obey a subpoena served upon that person may be deemed a contempt of the court in which the subpoena is issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place or within the hours provided by a subpoena of subpoenaing

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Robert H. Jordan

Tel: 843.534.4221

Fax: 843.722.8700

robert.jordan@nelsonmullins.com

February 6, 2008

Via E-Mail and U.S. Mail

Frank M. Cisa, Esq.

Cisa & Dodds, LLP

858 Lowcountry Blvd., Suite 101

Mt. Pleasant, SC 29464

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and Departure Films
USDC Civil Action No.: 2:06-CV-2195-CWH
Our File No.: 28692/01500
Chubb File No. 133228

Dear Frank:

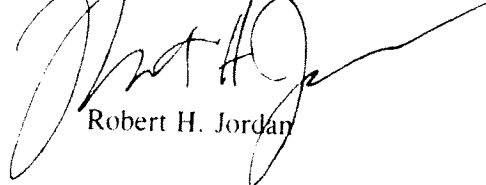
Per my paralegal's conversations with Ashley of your office, please find enclosed for service upon you the following documents:

1. Notice of Deposition of William Campbell; and
2. Notice of Deposition of Robert Bass and related Subpoena to Mr. Bass.

We assume that you will accept service of the Subpoena on Mr. Bass' behalf; however, if this is not the case, please let me know immediately and we will arrange for service by other means.

As always, thank you for your cooperation in this matter.

Very truly yours,



Robert H. Jordan

RHJ:ll

Enclosures

cc: Jeremy Feigelson, Esq.
Richard A. Farrier, Jr., Esq. (both w/enclosures)

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF SOUTH CAROLINA
 CHARLESTON DIVISION

TRADEMARK PROPERTIES, INC., a)	Civil Action No. 2:06-cv-2195-CWH
South Carolina corporation; RICHARD C.)	
DAVIS, an individual,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
A&E TELEVISION NETWORKS, and)	
MAX WEISSMAN PRODUCTIONS,)	
INC. d/b/a DEPARTURE FILMS,)	
)	
Defendants.)	
_____)	
)	
A&E TELEVISION NETWORKS,)	
)	
Counterclaim Plaintiff,)	
)	
vs.)	
)	
TRADEMARK PROPERTIES, INC. and)	
RICHARD C. DAVIS,)	
)	
Counterclaim Defendants.)	
)	
)	

NOTICE OF DEPOSITION OF WILLIAM CAMPBELL

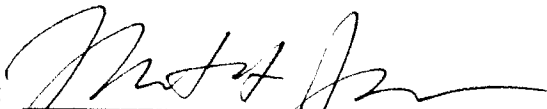
TO: FRANK M. CISA, ESQUIRE, ATTORNEY FOR THE PLAINTIFFS:

PLEASE TAKE NOTICE that on February 20, 2008, commencing at 10:00 a.m. at the law offices of Nelson Mullins Riley & Scarborough, LLP, 101 Constitution Avenue, Suite 900,

Washington, DC 20001, defendant and counterclaimant A&E Television Networks and defendant Max Weissman Productions, Inc. d/b/a Departure Films shall take the deposition of William Campbell.

The deposition will take place upon oral examination pursuant to the Federal Rules of Civil Procedure before an officer authorized by law to administer oaths or any other authorized person. The deposition will be recorded by stenographic and video means. Counsel is invited to attend and cross-examine.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Richard A. Farrier, Jr. (Fed. #772)

Robert H. Jordan (Fed. #6986)

Liberty Building, Suite 600

151 Meeting St.

P.O. Box 1806 (29402)

Charleston, SC 29401

(843) 853-5200

Of Counsel:

Bruce P. Keller

Jeremy Feigelson

S. Zev Parnass

DEBEVOISE & PLIMPTON LLP

919 Third Avenue

New York, New York 10022

(212) 909-6000

Admitted Pro Hac Vice

*Attorneys for Defendant/Counterclaimant A&E
Television Networks and Defendant Max Weissman
Productions, Inc. d/b/a Departure Films*

February ⁶/₈, 2008

Charleston, South Carolina

CERTIFICATE OF SERVICE

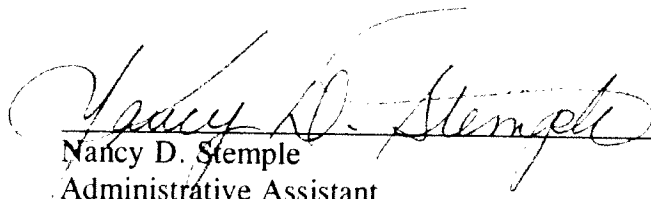
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Defendants A&E Television Networks ("AETN") and Max Weissman Productions, Inc. d/b/a Departure Films ("Departure Films"), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified via electronic mail and U.S. Mail, first-class, postage prepaid, to the following address(es):

Pleadings:

NOTICE OF DEPOSITION OF WILLIAM CAMPBELL

Counsel Served:

Frank Cisa, Esquire
Cisa & Dodds, LLP
858 Lowcountry Blvd., Suite 101
Mt. Pleasant, SC 29464



Nancy D. Stemple
Administrative Assistant

Feb 6, 2008