

# Exhibit C

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**From:** Jeffrey Pagano <[jpagano@suffolklaw.com](mailto:jpagano@suffolklaw.com)>  
**Sent:** Friday, August 2, 2019 4:48 AM  
**To:** Laurent S. Drogin <[LDrogin@tarterkrinsky.com](mailto:LDrogin@tarterkrinsky.com)>  
**Subject:** [EXT] Re: Chase Robinson v. Robert De Niro, Canal Productions, Inc. et al

Laurent,

It is important that you appreciate that the quoted comments set forth in my most recent email are but a few examples of inappropriate comments made by Mr. De Niro in the "workplace" directed to Ms. Robinson that immediately came to mind. After reconsidering my emails to you in the context of a stated objective set forth in your reply email, I do not want a going forward evaluation of the situation by you and/or Mr. De Niro to be conducted based upon a faulty premise in this regard. Indeed, your comment "You've thrown the entire house at me, not just the kitchen sink." is wishful thinking to say the least based upon a limited review of certain records and information provided to me.

As Mr. De Niro is quite aware, Ms. Robinson keeps copious and voluminous records. As of this time, I have not felt it appropriate to invest the time to completely review and analyze all available records and information in the hope the matter could be informally resolved, which is why I contacted you. At this point in the process, the life of Mr. De Niro extending over an 11 year period, as related from the perspectives of a former employee performing the the duties of a Personal Assistant, although titled otherwise and information concerning other witnesses is none of my business, nor that of my staff or third parties. Similarly, I have concluded that it is in the best interest of all concerned under the circumstances to review and publish as little information as possible, even within written communications among opposing counsel as of this time. In this context, I believe a resolution of the situation by the interested parties is enhanced thereby enabling both parties to move forward in their respective life without looking backwards, except for mutual support and admiration.

I hope you understand and appreciate my perspective. As you are aware ("...good old days of Local 295...") I have primarily represented employers for over 38 years. I appreciate the importance and value of pre- litigation nondisclosure. As you are aware, there are many lawyers who take the opposite approach, particularly as to high profile individuals.

I look forward discussing the situation upon your return to the office on August 12, 2019.

Regards,

Jeffrey W. Pagano | Partner  
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