

EXHIBIT C



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File No. 42995.530

VIA E-MAIL & REGULAR MAIL

Anthony W. Eckert, III, Esq.
KAPLAN, MASSAMILLO & ANDREWS, LLC
70 East 55th Street, 25th Floor
New York, New York 10022

Re: **Cadigan v. Liberty Helicopters, Inc., et al.**
Index No.: 152286/2018 (New York Supreme)

Dear Mr. Eckert:

As you know, the undersigned is counsel to the Defendants, Liberty Helicopters, Inc., Meridian Consulting I Corporation, Inc., and Richard Zemke Vance (collectively, "Liberty" unless necessary to distinguish) in the above-referenced matter. Enclosed herewith please find Liberty's jurisdictional Demand for Discovery and Inspection, pursuant to CPLR 3120. Additionally, I am enclosing a supplemental demand for discovery and inspection which joins in certain of the demands propounded by plaintiffs in their Notice to Produce, dated on or about July 10, 2018.

Liberty takes the position that limited jurisdictional discovery is essential to evaluate the New York forum contacts of Apical Industries, Inc., d/b/a Dart Aerospace ("Apical"). The Appellate Division, First Department has acknowledged that jurisdictional discovery is appropriate in cases where facts as to forum contacts are not easily ascertained and may support a finding of jurisdiction. See, e.g., Universal Inv. Advisory SA v. Bakrie Telecom PTE, Ltd., 2017 NY Slip Op 06344, 154 A.D.3d 171, 178, 62 N.Y.S.3d 1, 7 (App. Div., 1st Dept.)(reversing grant of premature motion to dismiss to permit jurisdictional discovery).

In view of the foregoing, I would respectfully ask that Apical respond to the demands in accordance with the CPLR so that the question of whether it is subject to in personam jurisdiction in the State of New York can be properly determined.

Very truly yours,

/s/ Douglas H. Amster
Douglas H. Amster of
LEWIS BRISBOIS BISGAARD & SMITH LLP