

EXHIBIT C

QV & The Red Couch

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 07-60534-CIV-DIMITROULEAS
MAGISTRATE JUDGE: ROBIN ROSENBAUM

HOWARD K. STERN,

Plaintiff,

vs.

JOHN O'QUINN,

Defendant.

_____ /

DEFENDANT JOHN O'QUINN'S RULE 26 DISCLOSURES

Defendant, JOHN O'QUINN, by and through his undersigned counsel, pursuant to Rule 26, Fed.R.Civ.P., Local Rule 26.1(a) hereby makes the following initial disclosures based on information known to the Defendant and his attorneys at the time of this disclosure:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

John O'Quinn is currently aware of the following individuals who are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

LAW OFFICES OF

SLK

STEPHENS LYNN KLEIN
LA CAVA HOFFMAN & PUYA, P.A.

QV & The REQ Couch

1. **Howard K. Stern**
c/o L. Lin Wood
Powell Goldstein LLP
One Atlantic Center
Fourteenth Floor
1201 West Peachtree Street, N.W.
Atlanta, GA 30309
(404) 572-6600
Subject: Statements made by Mr. O'Quinn
2. **John O'Quinn**
c/o Robert M. Klein
Stephens, Lynn, Klein,
LaCava, Hoffman & Puya, P.A.
9130 S. Dadeland Blvd.
Datran Two, Penthouse II
Miami FL 33156
(305) 670-2700
Subject: Statements made by Mr. O'Quinn
3. **Virgie Authur**
Address withheld for privacy reasons
Telephone: Withheld for privacy reasons
Subject: Statements made by Mr. O'Quinn
4. **Larry Birkhead**
Address withheld for privacy reasons
Telephone: Withheld for privacy reasons
Subject: Statements made by Mr. O'Quinn
5. **Maurice Brighthaupt**
Address withheld for privacy reasons
Telephone: To be obtained and provided
Subject: Circumstances surrounding death of Anna Nicole
6. **Tasma Brighthaupt**
Address withheld for privacy reasons
Telephone: To be obtained and provided
Subject: Circumstances surrounding death of Anna Nicole
7. **Nathaniel Collins**
Address to be determined and provided
Telephone: To be Determined
Subject: Relationship between Anna Nicole Smith and Stern

8. **Rita Cosby**
Address: New York, New York
Telephone: Unknown
Subject: Interview of February 19, 2007
9. **Dr. Kristine Eroshevich**
Address: Encino, California
Telephone: To be determined and provided
Subject: Medications prescribed to Anna Nicole Smith
10. **Eric Gibson**
Address: Nassau, Bahamas
Telephone: Withheld for privacy reason
Subject: Relationship between Anna Nicole Smith and Stern
11. **Gerlene Gibson**
Address: Nassau, Bahamas
Telephone: Withheld for privacy reason
Subject: Relationship between Anna Nicole Smith and Stern
12. **Nancy Grace**
Address: New York, New York
Telephone: Unknown
Subject: Interviews with CNN
13. **Sandeep Kapoor**
Address: California
Telephone: Unknown
Subject: Medications prescribed to Anna Nicole Smith
14. **Brigitte Neven**
Address: Nassau, Bahamas
Telephone: To be determined
Subject: Circumstances surrounding death of Anna Nicole
15. **Eric Redding**
Address: Texas
Telephone: To be determined and provided
Subject: Relationship between Anna Nicole Smith and Stern
16. **Juan Rivera**
Address: To be determined and provided
Telephone: To be determined and provided
Subject: Response to emergency call at the Hard Rock Hotel and Casino concerning Anna Nicole Smith

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17. **Sandy Serrano**
Address: To be determined and provided
Telephone: Withheld for privacy reason
Subject: Relationship between Anna Nicole Smith and Stern
18. **Greta Van Susteren**
Address: New York, New York
Telephone: Unknown
Subject: Various interviews with Fox News
19. **Kim Walther**
Address: To be determined and provided to Defendant
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
20. **Nadine Alexis**
Address: Nassau, Bahamas
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
21. **Joshua Perper**
Address: Chief Medical Examiner
Broward County Medical Examiner's Office
5301 S.W. 31st Avenue
Ft. Lauderdale, FL 33312
Telephone: (954) 327-6520
Subject: Cause of Death
22. **Queetlie Alexis**
Address: Nassau, Bahamas
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
23. **Gaither Ben Thompson**
Address: Myrtle Beach, South Carolina
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
24. **Stanford Ford Shelley**
Address: Myrtle Beach, South Carolina
Telephone: To be determined
Subject: Anna Nicole Smith

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LA CAVA HOFFMAN & PUYA, P.A.

25. **Gina Shelley**
Address: Myrtle Beach, South Carolina
Telephone: To be determined
Subject: Anna Nicole Smith
26. **Peter Nygard**
Address: Lyford Cay a/k/a Nygard Cay, Bahamas
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
27. **Garlene Gibson**
Address: Bahamas
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
28. **Alexander Denk**
Address: To be determined and provided
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
29. **Harold Schueler**
Address: Medical Examiner & Trauma Services
5301 S.W. 31st Avenue
Ft. Lauderdale, FL 33312
Telephone: (954) 964-0500
Subject: Cause of Death
30. **Alex Katz**
Address: To be determined and provided
Telephone: To be determined
Subject: Cause of Death
31. **Jack Harding**
Address: To be determined and provided
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
32. **Mark Speer**
Address: To be determined and provided
Telephone: To be determined
Subject: Relationship between Anna Nicole Smith and Stern
33. **Ray Martino**
Address: To be determined and provided
Telephone: To be determined
Subject: Relationship between Smith and Stern

34. **Duane Sands, M.D.**
Address: Bahamas
Telephone: To be determined
Subject: Cause of Death
35. **Timothy Barets, M.D.**
Address: To be determined and provided
Telephone: To be determined
Subject: Cause of Death
36. **Ned Bruck**
Address: Real Deal Yachts
Fontainebleau Resort Miami Beach
4441 Collins Avenue
Miami Beach, FL 33140
Toll-free: 877-283-4740
Telephone: 305-538-2022
Subject: Cause of Death
37. **Mark Dekema**
Address: Real Deal Yachts
Fontainebleau Resort Miami Beach
4441 Collins Avenue
Miami Beach, FL 33140
Toll-free: 877-283-4740
Telephone: 305-538-2022
Subject: Cause of Death
38. **Detective Marian Bryant**
Seminole Police Department
6300 Stirling Road
Hollywood FL 33024
Telephone: (800) 683-7800
Subject: Cause of Death
39. **Dr. Gertrude M. Juste**
Broward County Medical Examiner's Office
5301 S.W. 31st Avenue
Ft. Lauderdale, FL 33312
Telephone: (954) 327-6520
Subject: Cause of Death
40. This Defendant reserves the right to supplement and/or amend his initial disclosure response.

(B) A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment.

1. All documents referred to in the Complaint
2. Documents relating to the investigation into the death of Anna Nicole Smith.
3. Documents relating to the investigation into the death of Daniel Smith.
4. Any and all documents introduced during the deposition of John O'Quinn.
5. Deposition transcript of John O'Quinn taken on or about August 16, 2007.
6. This Defendant reserves the right to supplement and/or amend this disclosure response.

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of the injuries suffered.

N/A

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be

entered in the action or to indemnify or reimburse for payments made to satisfy the judgments.

John M. O'Quinn & Associates LLP
Lloyds, Policy No. 146/LDUSA0600866

A copy of the policy is available for inspection and/or copying.

WE HEREBY CERTIFY that on September 26, 2007, this document was e-filed using the CMECF system and that a true and correct copy was served via e-mail to: **L. LIN WOOD, ESQ.**, (llwood@pogolaw.com) Powell Goldstein LLP, Co-counsel for Plaintiff, One Atlantic Center, 14th Floor, 1201 W. Peachtree Street, N.W., Atlanta, GA 30309; and **M. KRISTA BARTH, ESQ.** (krista@empattorneys.com), Eric M. Sauerberg, P.A., Co-counsel for Plaintiff, Suite 102, 200 Village Square, Palm Beach Gardens, FL 33410 **NEIL McCABE, ESQ.**, (neilm@oqlaw.com) The O'Quinn Law Firm, 440 Louisiana, Suite 2300, Houston, TX 77002 who are listed as recipients as counsel under said system.

STEPHENS LYNN KLEIN LA CAVA
HOFFMAN & PUYA, P.A.

Counsel for Defendant

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ROBERT M. KLEIN
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