

EXHIBIT C

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JEROME ANN BISHOP
BEAUFORT COUNTY, S.C.
CLERK OF COURT

STATE OF SOUTH CAROLINA)
COUNTY OF BEAUFORT)

IN THE COURT OF COMMON PLEAS

Albert R. LaFleur and Eileen M. LaFleur,)
Plaintiffs,)
-v-)
Coral Resorts, LLC,)
Defendant.)

C/A No.: 2012-CP-07-3746

AFFIDAVIT OF B. DEAN PIERCE

PERSONALLY APPEARED before me, B. Dean Pierce, who being first duly sworn, testifies that:

1. My name is B. Dean Pierce. I am a resident of South Carolina.
2. I am over 18 years old.
3. I have personal knowledge of the truth of the facts stated herein.
4. I am the General Counsel of Coral Resorts, LLC.
5. Coral Resorts, LLC ("Coral Resorts") is a private, closely-held company.
6. Coral Resorts is the developer of the Island Links Resort ("Island Links"), located at the Port Royal Plantation on Hilton Head Island, South Carolina.
7. On June 3, 2013, the Plaintiffs filed a one-page memorandum in support of their Motion to Amend their Complaint with the Beaufort County Clerk of Court.
8. Attached to the memorandum as exhibits were hundreds of pages of documents ("the Documents") that contain confidential details of the development, management, and marketing of Island Links and the corporate organizational structure and financial information of Coral Resorts.
9. The Documents disclose, among other information, internal budgets for Island Links; contracts between Island Links and some of its service providers and management;

sales and marketing plans, procedures and practices for Island Links, including locations of customer accommodations, sources and values of premiums given away for attending a sales tour, sources of lead generation, internal procedures for qualifying customers, marketing procedures and mail marketing procedures; ownership of Coral Resorts; Coral Resorts' Operating Agreement; financing arrangements between Coral Resorts and a lender; and Coral Resorts, LLC's marketing and sales agreement with a real estate broker for sales of timeshare interests.

10. The plans, procedures, contracts, and relationships detailed in the Documents are the result of Coral Resorts' years of experience in the timeshare business and were developed at great cost, expense, and effort.
11. Although some of the information contained in the Documents is available from certain entities or agencies, upon information and belief, the information described in Paragraph 9 is not readily ascertainable by the public through proper channels.
12. Coral Resorts consistently treats these Documents and the information they contain as highly sensitive, proprietary, private, and confidential. Coral Resorts has taken reasonable precautions to maintain the secrecy of the information and to protect this information from disclosure, including requiring confidentiality agreements with its independent contractor sales force and zealously defending against producing information of this type in the course of litigation.
13. The information disclosed in the Documents derives substantial independent commercial and economic value and provides a competitive advantage to Coral Resorts by not being generally known by the public or competitors.
14. From time to time, Coral Resorts is required to submit confidential information and documentation to regulators because the timeshare industry is a regulated industry subject to government oversight. When Coral Resorts submits information for review by regulators, it is with the reasonable expectation that no information will be disclosed

other than in response to an appropriate Freedom of Information Act request, subpoena, or court order and that even then confidential business information will be redacted prior to release of any documentation.

15. Upon information and belief, some, if not all, of the Documents were obtained by the Plaintiffs through an improper, unsanctioned release of confidential business information.
16. Coral Resorts will suffer immediate irreparable harm if the Documents are permitted to remain publicly available in the Beaufort County Clerk of Court's office.
17. If the Documents remain publicly available, Coral Resorts' competitors will have open access to many aspects of the internal organization and management of Coral Resorts' business and a road map to Coral Resorts' commercial strategy.
18. Not only will this mean the loss of competitive advantage derived from the information in the Documents, but it will also give the competitive advantage to competitors. One such competitor is already represented by the same attorney as the Plaintiffs.
19. If the Documents remain publicly available, there is no adequate remedy at law for the damage to Coral Resorts and its sales and marketing plans, strategies, and contractual relationships.
20. Counsel for the Plaintiffs is and has been involved in a number of other claims and lawsuits involving Coral Resorts to the point where he has developed a cottage industry of suing Coral Resorts. I can see no other purpose for his filing of the Documents other than as a bad faith effort to inject Coral Resorts' confidential, proprietary, and highly sensitive business information into the public domain in order to harm, annoy, embarrass and oppress Coral Resorts.

FURTHER AFFIANT SAYETH NOT.



B. Dean Pierce

SWORN to before me this 7th day of June, 2013.

Karyn Kleckley
Notary Public For South Carolina

My Commission Expires: March 20, 2012