

# EXHIBIT 15



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January 5, 2022

**VIA EMAIL**

Apple Legal  
Apple, Inc.  
One Apple Park Way  
Cupertino, CA 95014  
[AppStoreNotice@apple.com](mailto:AppStoreNotice@apple.com)

Re: *APP89955*

Dear Apple App Store:

We are counsel to Garena International I Private Ltd., Garena Online Private Ltd. (now known as Moco Studios Private Limited), and Sea Ltd. (collectively, “Garena”).

We write in response to your email dated December 23, 2021 wherein you informed Garena that Krafton, Inc. (“Krafton”) had alleged that Garena’s applications *Garena Free Fire – New Age* (Apple ID 1300146617) and *Garena Free Fire MAX* (Apple ID 1480516829) infringe Krafton’s intellectual property rights, in particular, its copyright. Garena denies Krafton’s allegations and will be disputing them in the appropriate forum.

In any event, it is a matter of public record that Garena and PUBG Corp. (which merged with Krafton in 2020 and assumed PUBG Corp.’s contractual obligations), previously litigated in arbitration the validity of a settlement agreement concerning PUBG’s (now Krafton’s) purported copyright claims. *See* the Singapore Court of Appeal’s reported judgment in *PUBG Corp v Garena International I Pte Ltd and others* [2020] 2 SLR 379, Civil Appeal No. 184 of 2019 (May 19, 2020), a copy of which is enclosed to this letter.

As stated in the Court of Appeal’s judgment, the settlement agreement provides for “any dispute, controversy, claim or difference of any kind” arising in connection with the settlement agreement to be resolved by arbitration. The other details of the referenced settlement agreement are confidential, but Krafton is aware of its existence and terms. Krafton is also aware that after the arbitration, PUBG Corp. discontinued the High Court proceedings referred to above. Krafton has chosen not to disclose any of these matters to Apple in filing this notification.

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To the extent there is any remaining dispute, we fully expect that arbitration will resolve the dispute in Garena's favor.

Please direct any further questions or concerns to us. All of Garena's rights are reserved.

Very truly yours,

Mark A. Lemley

MAL:co

cc: Yunji Yang ([romel1945@bluehole.net](mailto:romel1945@bluehole.net))  
Sean Anderson ([sranderson@winston.com](mailto:sranderson@winston.com))