
EXHIBIT 2

Will Ellerman

From: Carlson, Erik <ecarlson@wsgr.com>
Sent: Friday, February 2, 2018 7:41 PM
To: Ari Rafilson
Cc: Michael Shore; Alfonso G Chan; Joseph DePumpo; Russell DePalma; Christopher Evans; Andrew M. Howard; Will Ellerman; Hiromasa Ohashi; Jeff Horn; Cody Kachel; Yuri Sakaguchi; Yurie Asako; Stamatios Stamoulis; Richard Weinblatt; Rhonda Polvado; Bindu Palapura; David Ellis Moore; Stephanie O'Byrne; James Yoon; Jose Villarreal; Henry Pan; Edward Poplawski; OVT IPBridge
Subject: RE: 1:16-cv-00290-JFB-SRF - Godo Kaisha IP Bridge 1 v. OmniVision Technologies, Inc.

Dear Counsel:

We've received IP Bridge's disclosures of its proposed expert Albert Theuwissen in the Del. -290 case and the N.D. Cal. - 778 case. We are still reviewing those disclosures and have yet to obtain client approval but have identified some issues we raise now in the hopes of resolving the issues as soon as possible.

First, given Dr. Theuwissen's foreign domicile, OmniVision objects to Dr. Theuwissen's disclosure as an expert to the extent the expert intends to review any confidential materials produced by OmniVision outside the United States. This objection extends to both the physical removal of confidential material outside the United States, and to online review of confidential information from a location outside the United States. Such activities would run afoul of the Export Control provisions of Paragraph 13.3 of the Stipulated Protective Order. Moreover, this exposes OmniVision's confidential information for access outside the jurisdiction of the Court. Such risk could be highly prejudicial to OmniVision.

Second, please identify which party in the *IV v. Canon* case retained Dr. Theuwissen. This information is required by Paragraph 7.4(a)(5) of the Stipulated Protective Order. In the future, please be sure to provide this information in the first instance.

We look forward to your response

Regards,
Erik

 Erik J. Carlson • Wilson Sonsini Goodrich & Rosati
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From: Ari Rafilson [mailto:arafilson@ShoreChan.com]
Sent: Friday, February 02, 2018 9:00 AM
To: Poplawski, Edward; Carlson, Erik; Bindu Palapura; David Ellis Moore; Stephanie O'Byrne; Yoon, James; Villarreal, Jose; Pan, Henry; WSGR - OVT/IP Bridge
Cc: Michael Shore; Alfonso G Chan; Joseph DePumpo; Russell DePalma; Christopher Evans; Andrew M. Howard; Will Ellerman; Hiromasa Ohashi; Jeff Horn; Cody Kachel; Yuri Sakaguchi; Yurie Asako; Stamatios Stamoulis; Richard Weinblatt; Rhonda Polvado
Subject: RE: 1:16-cv-00290-JFB-SRF - Godo Kaisha IP Bridge 1 v. OmniVision Technologies, Inc.

Counsel, In addition to the disclosures made in the attached letter, please be advised that Dr. Theuwissen is currently serving as a consultant to Alston & Bird on behalf of Complainants, Honeywell International, Inc., Hand Held Products, Inc., and Metrologic Instruments, Inc. in *Certain Bar Code Readers, Scan Engines, Products Containing the Same, and Components Thereof* ITC Investigation No. 377-TA-1061. He has not provided expert testimony in that case.

Best Regards,



Ari Rafilson
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901 Main Street, Suite 3300
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214-593-9114 (Direct)
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From: Rhonda Polvado

Sent: Tuesday, January 30, 2018 4:59 PM

To: Edward Poplawski <epoplawski@wsgr.com>; Erik Carlson <ecarlson@wsgr.com>; Bindu Palapura <bpalapura@potteranderson.com>; David Ellis Moore <dmoore@potteranderson.com>; Stephanie O'Byrne <sobyrne@potteranderson.com>; James Yoon <jyoon@wsgr.com>; Jose Villarreal <jvillarreal@wsgr.com>; Henry Pan <hpan@wsgr.com>; OVT IPBridge <OVT_IPBridge@wsgr.com>

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Subject: 1:16-cv-00290-JFB-SRF - Godo Kaisha IP Bridge 1 v. OmniVision Technologies, Inc.

Counsel,

Please see the attached correspondence.



Rhonda K. Polvado
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Dogs are not our whole life, but they make our lives whole.
~ Roger Caras

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