

From: Jay, Michael michael.jay@dlapiper.com
Subject: Re: Solas v. Apple/Motorola, 6:20-cv-00840/00842 (WDTX)
Date: December 7, 2020 at 1:29 PM

MJ

To: Philip Wang pwang@raklaw.com

Cc: solas@raklaw.com, Padmanabhan, Nandan nandan.padmanabhan@dlapiper.com, Guaragna, John john.guaragna@dlapiper.com, Beale, Kristin kristin.beale@dlapiper.com, Gibson, Erin erin.gibson@dlapiper.com, Lineberry, Alice alice.lineberry@dlapiper.com

Philip,

I am told the Motorola agreement is complete. By when do you plan on filing the dismissal? We would rather you just file that than us ask for another extension to answer.

For the older Solas case, if you want to ask for a stay of all dates, that would be fine with us.

Mike

From: Philip Wang <pwang@raklaw.com>
Sent: Monday, December 7, 2020 12:46:10 PM
To: Jay, Michael <Michael.Jay@us.dlapiper.com>
Cc: solas@raklaw.com <solas@raklaw.com>; Padmanabhan, Nandan <nandan.padmanabhan@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Beale, Kristin <Kristin.Beale@us.dlapiper.com>; Gibson, Erin <Erin.Gibson@us.dlapiper.com>; Lineberry, Alice <alice.lineberry@us.dlapiper.com>
Subject: Re: Solas v. Apple/Motorola, 6:20-cv-00840/00842 (WDTX)

[EXTERNAL]

Mike,

That's okay with us. We also understand that in the more advanced Solas v. Apple case, we'll agree to a mutual extension of any discovery responses due before resolution.

Philip

Philip Wang
Russ August & Kabat
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Los Angeles, CA 90025
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pwang@raklaw.com

On Dec 7, 2020, at 10:53 AM, Jay, Michael <michael.jay@dlapiper.com> wrote:

Philip,

Given the pending settlement, we intend to ask for an additional three weeks—to December 30—to respond to the Complaints in the Apple and Motorola actions. Let me know if Solas agrees. Thanks.

Mike

Michael Jay
Partner

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From: Jay, Michael
Sent: Tuesday, November 17, 2020 1:07 PM
To: Philip Wang <pwang@raklaw.com>
Cc: solas@raklaw.com; Padmanabhan, Nandan <nandan.padmanabhan@us.dlapiper.com>; Guaragna, John <John.Guaragna@us.dlapiper.com>; Beale, Kristin <Kristin.Beale@us.dlapiper.com>; Gibson, Erin <Erin.Gibson@us.dlapiper.com>
Subject: Solas v. Apple/Motorola, 6:20-cv-00840/00842 (WDTX)

Philip,

Given the present circumstances, we would like an additional three weeks—until December 16— for Apple and Motorola to respond to the Complaints in the recently-filed WDTX actions. Please let me know if Solas will agree. Thanks.

Mike

Michael Jay
Partner

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