

Exhibit 26

Fryer, Jennifer

From: Stringfield, Daniel
Sent: Friday, October 30, 2015 5:01 PM
To: 'Walker, Cy'; ddacus@dacusfirm.com; Billah, Zaed; Hails, Robert; ~~Sony-Raytheon
Cc: Steptoe Raytheon 678 Litigation; Bo Davis; Sue Mellinger
Subject: RE: Raytheon v. Samsung, et al., Lead Case No. 2:15-cv-00341-JRG-RSP - Sony Discovery Deficiencies

Cy,

Thank you for your letter of October 27.

First, regarding the 73 enumerated categories of documents listed in our October 13 letter, we disagree that they are overly broad, duplicative or inconsistent with the Court's Discovery Order. To the contrary, the Court's Discovery Order required Sony to produce—without any prompting from Raytheon—all documents and things that are relevant to the pleaded claims and defenses involved in this case.

As your letter acknowledges, we provided these categories well in advance of Sony's document production as a courtesy to assist Sony with its document collection and production efforts. When we received and reviewed Sony's document production, and determined that none of the 73 categories were completely satisfied (and most were not even addressed), we wrote on October 13 to seek the clarification from Sony to which we are entitled under Paragraph 9(a) of the Discovery Order: for each category, Sony must either agree to provide the requested information or provide a basis for why it will not produce the requested information.

Contrary to the assertion in your letter, we were willing to discuss, and in fact did discuss, these topics during our call. We specifically discussed many of the categories (e.g., chip samples, SIMS analyses, videos and images of the processes, etc.) with the understanding that your October 27 letter would address all of the categories. Your responsive letter, however, fails to address the specific items we identified as missing from Sony's production.

Turning to the remainder of your letter, we appreciate Sony's candor in acknowledging that its technical document production is incomplete and further appreciate Sony's willingness to collect and provide these materials as soon as possible. However, Sony has failed to provide an unequivocal commitment to provide the requested items and by a date certain. As I explained during our call, because Sony requires Raytheon and its experts to come inspect these documents at your DC office, a piecemeal "rolling basis" production is extremely burdensome and costly. You admitted that the collection of materials presently available for review was not yet of a sufficient quality or quantity to warrant our visit and further indicated your belief that the collection of documents presently available for review were not sufficient to make a determination of infringement. As you are aware, P.R. 3-4(a) required a complete production of technical documentation sufficient to show the operation of any aspects of an Accused Instrumentality for this very reason. Sony was required to make that production six (6) weeks ago, on September 17, 2015. Sony's failure to timely make that production prejudices Raytheon and Raytheon cannot continue to allow Sony to ignore the deadlines in this case and its discovery obligations. We therefore request an in-person meet and confer with lead and local counsel on these issues by November 6, 2015. We suggest that we meet in Dallas, but are open to other locations on a mutually agreeable date.

Regarding your claim that the number of sensor models at issue in this case makes it "impractical to collect the requested fabrication-related documents on all the different models within a reasonable period of time," we disagree. Sony has had ample time to collect the requested documents and, in any event, has not sought an extension of any deadlines or previously raised this issue with Raytheon or the Court. Your letter appears to suggest that Sony will propose certain microelectronic devices to act as representatives for all accused devices in the case. So that we may

fully understand and consider Sony's proposal, please provide us Sony's proposed representative-device framework, including the stipulations Sony is willing to make as to the typicality of the representatives, the nature and significance of the variations between the representatives and the non-representatives, and the relative completeness of the technical documentation available for the representatives as compared to the non-representatives.

Regarding the sales, financial and marketing documents as they relate to any accused sensor, whether or not manufactured, imported or sold in the U.S., please provide a date certain by which these documents will be produced. If we do not have a date certain, we can include this issue in our in-person meet and confer on the technical documents.

We look forward to working through these issues at our in-person meet and confer and avoiding motion practice on these basic discovery issues.

Best regards,

Dan

From: Walker, Cy [mailto:CWalker@kenyon.com]

Sent: Tuesday, October 27, 2015 6:05 PM

To: Stringfield, Daniel; ddacus@dacusfirm.com; Billah, Zaed; Hails, Robert; ~-~Sony-Raytheon

Cc: Steptoe Raytheon 678 Litigation; Bo Davis; Sue Mellinger

Subject: RE: Raytheon v. Samsung, et al., Lead Case No. 2:15-cv-00341-JRG-RSP - Sony Discovery Deficiencies

Counsel for Raytheon,

Please see the attached correspondence.

Best,

Cy

Cy Walker

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From: Stringfield, Daniel [mailto:dstringfield@Steptoe.com]

Sent: Tuesday, October 13, 2015 5:02 PM

To: ddacus@dacusfirm.com; Walker, Cy; Billah, Zaed; Hails, Robert; ~-~Sony-Raytheon

Cc: Steptoe Raytheon 678 Litigation; Bo Davis; Sue Mellinger

Subject: Raytheon v. Samsung, et al., Lead Case No. 2:15-cv-00341-JRG-RSP - Sony Discovery Deficiencies

Counsel for Sony,

Please see the attached correspondence.

Best regards,

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