

# EXHIBIT 15

**From:** [Bombach, Miguel J. \(SDO\)](#)  
**To:** [Iturralde, Enrique W.](#); [Bernstein, Matthew C. \(SDO\)](#); [Hurt, James \(SDO\)](#); [Canavera, Kyle Ryan \(SDO\)](#); [bcraft@findlaycraft.com](#); [efindlay@findlaycraft.com](#); [\\*Perkins Service HTC-AGIS](#)  
**Cc:** [AGIS-Lit](#)  
**Subject:** RE: AGIS - HTC's source code  
**Date:** Monday, October 01, 2018 8:53:47 PM

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Enrique,

Our code has been available for nearly half a year, and AGIS's failure to request inspection is its own fault.

I informed Ms. Messing that our source code was available for inspection via a May 16 letter. My letter asked for one-week notice to allow our staff time to set up an office. Ms. Messing and I had a meet and confer on May 17 and, on that call, I told her that our source code was available and again asked for one week notice. The ball was very clearly in AGIS's court since then to request inspection.

On July 31, Mr. Rubino provided a generic source-code related complaint to HTC via letter. From his letter, it was clear that he did not check with Ms. Messing or read my past correspondence prior to sending his letter. On August 16, I responded via letter telling Mr. Rubino that our source code was available, and has been since May 16. In my letter, I detailed the previous correspondence and meet and confer between Ms. Messing and I.

From your e-mail, it appears that you did not check with Ms. Messing or Mr. Rubino, or read my prior letters. The Brown Rudnick team is simply not communicating with each-other and not reading past letters (or perhaps your team is confusing HTC with another Android defendant?).

Our source code computer shall be ready on October 3. To make clear, I have repeatedly told Brown Rudnick attorneys that HTC does not have the source code for the accused applications. HTC has repeated that in its court filings and in our discovery responses. The source code will have the source code in HTC's possession, custody, or control.

Thanks,  
Miguel

**Miguel Bombach | Perkins Coie LLP**

11988 El Camino Real Suite 350  
San Diego, CA 92130-2594  
D. +1.858.720.5747  
C: +1 646.469.1474  
F. +1.858.720.5847  
E. [MBombach@perkinscoie.com](mailto:MBombach@perkinscoie.com)

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**From:** Iturralde, Enrique W. <EIturralde@brownrudnick.com>  
**Sent:** Monday, October 01, 2018 7:02 AM  
**To:** Bombach, Miguel J. (SDO) <MBombach@perkinscoie.com>; Bernstein, Matthew C. (SDO) <MBernstein@perkinscoie.com>; Hurt, James (SDO) <JHurt@perkinscoie.com>; Canavera, Kyle Ryan (SDO) <KCanavera@perkinscoie.com>; [bcraft@findlaycraft.com](mailto:bcraft@findlaycraft.com); [efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com); [\\*Perkins Service HTC-AGIS <PerkinsServiceHTC-AGIS@perkinscoie.com>](mailto:*Perkins Service HTC-AGIS@perkinscoie.com)

**Cc:** AGIS-Lit <agislit@brownrudnick.com>

**Subject:** Re: AGIS - HTC's source code

Miguel,

We did not receive any response to the below e-mail or any update about the availability of HTC source code. Please confirm that HTC no longer intends to produce any source code in this case.

Thanks,  
Enrique

From: "Iturralde, Enrique W." <[EIturralde@brownrudnick.com](mailto:EIturralde@brownrudnick.com)>  
Date: Saturday, July 28, 2018 at 5:31 AM  
To: "[mbombach@perkinscoie.com](mailto:mbombach@perkinscoie.com)" <[MBombach@perkinscoie.com](mailto:MBombach@perkinscoie.com)>, "[MBernstein@perkinscoie.com](mailto:MBernstein@perkinscoie.com)" <[MBernstein@perkinscoie.com](mailto:MBernstein@perkinscoie.com)>, James Hurt <[jhurt@perkinscoie.com](mailto:jhurt@perkinscoie.com)>, "[kcanavera@perkinscoie.com](mailto:kcanavera@perkinscoie.com)" <[kcanavera@perkinscoie.com](mailto:kcanavera@perkinscoie.com)>, "[bcraft@findlaycraft.com](mailto:bcraft@findlaycraft.com)" <[bcraft@findlaycraft.com](mailto:bcraft@findlaycraft.com)>, "efindlay@findlaycraft.com" <[efindlay@findlaycraft.com](mailto:efindlay@findlaycraft.com)>, "[PerkinsServiceHTC-AGIS@perkinscoie.com](mailto:PerkinsServiceHTC-AGIS@perkinscoie.com)" <[PerkinsServiceHTC-AGIS@perkinscoie.com](mailto:PerkinsServiceHTC-AGIS@perkinscoie.com)>  
Cc: AGIS-Lit <[agislit@brownrudnick.com](mailto:agislit@brownrudnick.com)>  
Subject: AGIS - HTC's source code

Miguel,

Your May 16, 2018 letter states that "HTC Corp. will lay make its source code for its phones available for inspection." However, we have not received any further updates regarding the status of HTC's source code production. Please let us know when HTC's source code (for all HTC Accused Products) becomes available for inspection so that we can schedule a review. Please also let us know if you can make the code available for inspection at either one of Perkins Coie's NYC or DC offices.

Regards,  
Enrique

[<http://www.brbi.dom/signature/Brown%20Rudnick.jpg>]

Enrique W. Iturralde

Brown Rudnick LLP  
Seven Times Square  
New York, NY 10036

T: 212-209-4936

F: 212-938-2936

[eiturralde@brownrudnick.com](mailto:eiturralde@brownrudnick.com)<<mailto:eiturralde@brownrudnick.com>>

[www.brownrudnick.com](http://www.brownrudnick.com)<<http://www.brownrudnick.com/>>

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