

# Exhibit 23

## Sung, Ye-Eun

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**From:** O'Connell, Sara J. [sara.oconnell@pillsburylaw.com]  
**Sent:** Sunday, June 17, 2018 8:01 PM  
**To:** Bakewell, Clark S.  
**Cc:** ZTE\_Hitachi; US-CLIENT-HM-ZTE-Service; Janet Orr; kbt@texarkanalaw.com; gpc@texarkanalaw.com; Eric Findlay; Brian Craft  
**Subject:** RE: Maxell v. ZTE - 6/17 Disclosures by Maxell

Clark,

We will not be presenting section 102 or 103 defenses for the '794, '493 or 729 patents.

I will follow up on the other matters shortly.

### Sara J. O'Connell | Counsel

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**From:** Bakewell, Clark S. <[CBakewell@mayerbrown.com](mailto:CBakewell@mayerbrown.com)>  
**Sent:** Sunday, June 17, 2018 4:53 PM  
**To:** O'Connell, Sara J. <[sara.oconnell@pillsburylaw.com](mailto:sara.oconnell@pillsburylaw.com)>  
**Cc:** ZTE\_Hitachi <[ZTEHitachi@Pillsburylaw.com](mailto:ZTEHitachi@Pillsburylaw.com)>; US-CLIENT-HM-ZTE-Service <[HM-ZTE-Service@mayerbrown.com](mailto:HM-ZTE-Service@mayerbrown.com)>; Janet Orr <[jorr@texarkanalaw.com](mailto:jorr@texarkanalaw.com)>; [kbt@texarkanalaw.com](mailto:kbt@texarkanalaw.com); [gpc@texarkanalaw.com](mailto:gpc@texarkanalaw.com); Eric Findlay <[EFindlay@FindlayCraft.com](mailto:EFindlay@FindlayCraft.com)>; Brian Craft <[BCraft@FindlayCraft.com](mailto:BCraft@FindlayCraft.com)>  
**Subject:** Maxell v. ZTE - 6/17 Disclosures by Maxell

Hi Sara,

Maxell makes the following disclosures:

#### Documentary demonstratives (sent via FTP):

- Demonstrative slides for voir dire
- Demonstrative slides for opening remarks
- The asserted patents
- Demonstrative slides for the direct examination of Dr. Caloyannides

#### Deposition designations:

- Shengjuan Wang (72:13 – 73:17; 102:8 – 103:23)

#### Exhibits subject to ongoing ZTE objections:

- PX-165, 166, 167, 168, 282, 283, 284, 287, 289, 290, 293, 294, 298, 299, 300, 303

#### Physical exhibits and non-documentary demonstratives (available for inspection):

- Check boards for Dr. Maher with respect to the asserted claims of the '491 and '695 patents

- PPX-5 and 6.

Maxell also confirms that it will not be objecting to the physical demonstratives that ZTE disclosed this afternoon for use tomorrow.

Lastly, we discussed a few matters this afternoon, which I wish to write up and confirm:

1. Objections to physical exhibits, exhibits that are listed as demonstrative-only, and exhibits that are subject to outstanding objections will be due at 8am the day before trial (not noon), but otherwise ZTE accepts the proposal regarding trial management procedures sent via email by Kfir on 6/13.
2. ZTE confirmed that it will not be using Colley either as an exhibit or otherwise, but maintained its notice regarding Alumbaugh

Clark

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