

EXHIBIT K

From: Miller, Tiffany A.
To: [Cunningham, Nicole S.](#); [Beaber, Jamie B.](#); [Fussell, Tripp](#)
Cc: ["gpc@texarkanalaw.com"](#); ["kbt@texarkanalaw.com"](#); [US-CLIENT-HM-ZTE-Service](#); [ZTE Hitachi](#); ["Eric Findlay"](#); ["Brian Craft"](#)
Subject: RE: Maxell, Ltd. v. ZTE Corporation et al., Case No. 5:16-cv-00179-RWS (E.D. Tex.)
Date: Monday, May 21, 2018 1:45:36 PM
Attachments: [image001.png](#)
[image002.png](#)

Nicole,

We agree to a mutual exchange for objections to rebuttal exhibits on Thursday.

Regards,
Tiffany

From: Cunningham, Nicole S. [mailto:nicole.cunningham@pillsburylaw.com]
Sent: Monday, May 21, 2018 3:39 PM
To: Miller, Tiffany A.; Beaber, Jamie B.; Fussell, Tripp
Cc: 'gpc@texarkanalaw.com'; 'kbt@texarkanalaw.com'; US-CLIENT-HM-ZTE-Service; ZTE_Hitachi; 'Eric Findlay'; 'Brian Craft'
Subject: RE: Maxell, Ltd. v. ZTE Corporation et al., Case No. 5:16-cv-00179-RWS (E.D. Tex.)

Tiffany,

Based on your email, it appears there was a misunderstanding between the parties in the meet and confer. We never understood that the parties contemplated limiting the exhibits as you describe at this juncture. Our understanding was that the parties would exchange opening exhibit lists limited to 200 exhibits each, and rebuttal exhibit lists also limited to 200 each. The parties would thereafter meet and confer to further limit the exhibits (as well as objections) as we continue pretrial preparations. We have successfully proceeded in this manner in previous cases as well, and expect to be able to work with your team to narrow the disputed issues. Nonetheless, we do not object to moving the date for objections to rebuttal exhibit lists to Thursday, but our position is that such a change should be mutual. Please let us know if Maxell agrees.

Best Regards,
Nicole

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From: Miller, Tiffany A. <TMiller@mayerbrown.com>
Sent: Monday, May 21, 2018 11:16 AM
To: Cunningham, Nicole S. <nicole.cunningham@pillsburylaw.com>; Beaber, Jamie B.

<JBeaber@mayerbrown.com>; Fussell, Tripp <JFussell@mayerbrown.com>

Cc: 'gpc@texarkanalaw.com' <gpc@texarkanalaw.com>; 'kbt@texarkanalaw.com' <kbt@texarkanalaw.com>; US-CLIENT-HM-ZTE-Service <HM-ZTE-Service@mayerbrown.com>; ZTE_Hitachi <ZTEHitachi@Pillsburylaw.com>; 'Eric Findlay' <EFindlay@FindlayCraft.com>; 'Brian Craft' <BCraft@FindlayCraft.com>

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Nicole,

Last week, at the Court's urging, the parties met and conferred and came to agreement regarding significant and meaningful narrowing of exhibits. Now, ZTE has identified 200 additional rebuttal exhibits, notably doubling the total number of exhibits and exceeding the Court's limit by 150 exhibits. We do not view this latest exchange to be within the spirit of the parties' agreement or the Court's admonition.

Please let us know whether ZTE will provide a narrowed list, exceeding no more than 50 exhibits, today. If ZTE is not so willing, Maxell requests until Thursday, May 24, to provide its objections to ZTE's rebuttal exhibit list. Maxell further reserves its right to raise this issue with the Court.

Regards,
Tiffany

From: Cunningham, Nicole S. [<mailto:nicole.cunningham@pillsburylaw.com>]

Sent: Monday, May 21, 2018 6:34 AM

To: Miller, Tiffany A.; Beaber, Jamie B.; Fussell, Tripp

Cc: 'gpc@texarkanalaw.com'; 'kbt@texarkanalaw.com'; US-CLIENT-HM-ZTE-Service; ZTE_Hitachi; 'Eric Findlay'; 'Brian Craft'

Subject: Maxell, Ltd. v. ZTE Corporation et al., Case No. 5:16-cv-00179-RWS (E.D. Tex.)

Counsel,

Please see the attached native version of ZTE USA's rebuttal exhibit list.

Best Regards,
Nicole

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