

EXHIBIT P

Redacted

From: Beaber, Jamie B.
To: Wisnia, Howard N.
Cc: Miller, Tiffany A.; Fussell, Tripp; Moore, Steve; Eric Findlay; ZTE Hitachi; US-CLIENT-HM-ZTE-Service; Geoff Culbertson; Brian Craft
Subject: RE: Maxell v. ZTE - Motion for Alternative Service
Date: Wednesday, June 13, 2018 8:21:04 AM

Howard,

As noted below your circular reasoning is not helpful with respect to whether or not Maxell will need a Mandarin translator.

With respect to your latter points, I believe that I already confirmed during our call on Monday that we would be calling Mr. Nakamura. I further indicated that we were working to develop witness ordering, etc. and I believe that we agreed that both parties would provide this information. So lets discuss when we are both in a position to provide useful information – let me know when you guys are at that place.

With respect to asserted claims, I indicated that we would again provide the remaining information when ZTE was in a place to provide us with the specific combinations it intends to proceed to trial with for all patents. You indicated that you were not prepared to do this on Monday even though Steve had committed to the Court to do this more than a month ago. To date we still do not have that information and for the '317 ZTE provided no helpful narrowing – the Court did that with its denial of ZTE's motion to amend. So lets discuss when ZTE is at that place – as you are well aware that must occur by mid-day on Thursday so that we can get the Court our amended pre-trial materials. I though you had committed to getting us this for the '193 patent sooner given it is relevant to our first witness.

Thanks,

J.B.

From: Wisnia, Howard N. [mailto:howard.wisnia@pillsburylaw.com]
Sent: Wednesday, June 13, 2018 11:07 AM
To: Beaber, Jamie B.
Cc: Miller, Tiffany A.; Fussell, Tripp; Moore, Steve; Eric Findlay; ZTE_Hitachi; US-CLIENT-HM-ZTE-Service; Geoff Culbertson; Brian Craft
Subject: Re: Maxell v. ZTE - Motion for Alternative Service

Jamie,

The depositions have been translated. I believe we've now addressed your concern. If not let me know what more information you need.

Can you answer my question as to what Japanese speaking witnesses you intend to bring live or will be within the subpoena power of the court during the trial? We assume Mr. Nakamura. Any others?

Also please send us the claim list for the 317 patent as promised.

Thanks, Howard

Best Regards, Howard

On Jun 13, 2018, at 8:03 AM, Beaver, Jamie B. <JBeaver@mayerbrown.com> wrote:

Howard,

You guys represented to the Court during the pretrial conference that you did not need any translators for witnesses you intended to call – so your comments below are unhelpful and not on point. The purpose of our request below is to secure any translators that might be necessary.

Thanks,

J.B.

From: Wisnia, Howard N. [<mailto:howard.wisnia@pillsburylaw.com>]
Sent: Wednesday, June 13, 2018 10:58 AM
To: Beaver, Jamie B.
Cc: Miller, Tiffany A.; Fussell, Tripp; Moore, Steve; Eric Findlay; ZTE_Hitachi; US-CLIENT-HM-ZTE-Service; Geoff Culbertson; Brian Craft
Subject: Re: Maxell v. ZTE - Motion for Alternative Service

We are going to call them, if at all, by depo. They will not be available for live testimony. Are you bringing all the inventors and other Japanese witnesses that have been designated by depo in case we want to call them live?

On Jun 13, 2018, at 7:53 AM, Beaver, Jamie B. <JBeaver@mayerbrown.com> wrote:

Howard,

These folks are all on our may call list – if ZTE is not going to call them then that resolves our issue. If ZTE is going to call them live or by depo designation we may want to call them live.

Thanks,

J.B.

From: Wisnia, Howard N. [<mailto:howard.wisnia@pillsburylaw.com>]
Sent: Wednesday, June 13, 2018 10:44 AM
To: Miller, Tiffany A.
Cc: Fussell, Tripp; Moore, Steve; Eric Findlay; ZTE_Hitachi; US-CLIENT-HM-ZTE-Service; Geoff Culbertson; Brian Craft
Subject: Re: Maxell v. ZTE - Motion for Alternative Service

Why would you need a Translator for depo designations? Explain please. We reserve our rights to call all witnesses we have designated by deposition.

Best Regards, Howard

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On Jun 13, 2018, at 7:34 AM, Miller, Tiffany A. <TMiller@mayerbrown.com> wrote:

Steve and Eric,

I want to follow up on the second point in Tripp's email below. Could you please confirm that ZTE will not call either live or by deposition designation [REDACTED] [REDACTED]? As noted previously, we need this information **immediately** so that we may coordinate interpreters.

Regards,
Tiffany

From: Fussell, Tripp
Sent: Thursday, June 07, 2018 4:40 PM
To: Moore, Steve; 'Eric Findlay'
Cc: ZTE_Hitachi; US-CLIENT-HM-ZTE-Service; Geoff Culbertson; 'Brian Craft'
Subject: RE: Maxell v. ZTE - Motion for Alternative Service

Steve and Eric,

With respect to narrowing the case for trial, Maxell remains willing to further narrow claims at issue in the case if ZTE is willing to identify the prior art and 103 combinations it intends to rely on at trial. This was raised in the email below, and we have yet to received any response notwithstanding your representations to the Court during the daubert/summary judgment hearing. If your intention is to proceed to trial with all 48 references that you have identified in the pretrial order, please confirm this and provide us with the specific combinations that you intend to rely upon at trial for these references.

Also, during the pretrial conference, you indicated to the Court that the parties will not need a translator for any ZTE witnesses testimony and that Waiman Lam would be its only party witness. We note that your witness list has many ZTE witnesses listed as "may call". Based on your statement to the Court can we confirm that ZTE will not call either live or by deposition designation [REDACTED] [REDACTED]? We of course need this information immediately for purposes of translators and further because these individuals are also on Maxell's witness list as "may call" witnesses.

Thanks,