

# EXHIBIT C

# Maxell, Ltd. v. ZTE USA Inc.

## Closing Argument

June 29, 2018

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## Plaintiff Wants You to Focus on China, NOT ZTE USA

MR. BEABER:

...You may also know or have gathered that ZTE USA is the wholly owned subsidiary of its **Chinese parent company**, ZTE Corporation. Essentially, ZTE USA, the Defendant here, they sell smartphones in the United States, including right here in Texarkana, as you heard yesterday, on behalf of ZTE Corporation.

Trial Transcript 06/19/18 AM 44:17-22

MR. BEABER:

...Now, in mid-2013, upon learning of ZTE's use of its patents, ZTE Corporation, **the mother ship again**, was contacted to engage in licensing discussions. Maxell provided detailed materials demonstrating ZTE's use.

Trial Transcript 06/19/18 AM 58:25-59:3

MR. BEABER:

...In fact, as you'll learn from Mr. Nakamura, even with Maxell's urging for the last five-plus years, again through communications with **ZTE Corporation, ZTE USA's mother ship**, ZTE refuses to pay Maxell any reasonable amount for its use.

Trial Transcript 06/19/18 AM 53:13-17

MR. BEABER:

...Since 2013, for three years before even filing this case, Maxell tried to convince ZTE through communications with **ZTE Corporation, their mother ship**, to do the right thing, to take a license

Trial Transcript 06/19/18 AM 45:22-46:2

MR. CULBERTSON:

...And did Hitachi and Maxell understand ZTE Corp to be **the mother ship**?

Trial Transcript 06/20/18 AM 74:9-14

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