

EXHIBIT A

From: Zhou, Vincent
Sent: Monday, November 4, 2019 1:33 PM
To: Siddiqui, Saqib; Beaber, Jamie B.; Grimaldi, Alan M.; Gelsleichter, Alison T.; Bonner, Amanda Streff; Paul, Baldine B.; Nese, Bryan; Fussell, Tripp; kbt@texarkanalaw.com; Levy, Kfir B.; Pluta, Robert G.; Miller, Tiffany A.; Barrow, William J.; gpc@texarkanalaw.com
Cc: #Maxell-Apple; melissa@gillamsmithlaw.com; Bobby Lamb; Tom Gorham (tom@gillamsmithlaw.com)
Subject: Maxell Ltd. v. Apple Inc. (Case 5:19-cv-00036-RWS) -- Invalidity Contentions
Attachments: Supp Inv Contentions - Ex B13.pdf
ProfileOnSend: 1

Counsel,

Apple intends to seek leave to supplement its invalidity contentions for the '493 patent to add the invalidity grounds specified in the attached supplemental invalidity chart. Apple has recently discovered the new prior art product identified in the attached chart (and its associated publications) as part of its continued diligent effort in searching for prior art. Please let us know if Maxell will oppose Apple's motion for leave. If Maxell does not oppose, Apple is amenable to grant a one-week extension to Maxell's preliminary election of asserted claims should Maxell require additional time to select its claims in view of Apple's supplementation, assuming that Maxell agrees to a similar extension to Apple's preliminary election of asserted prior art.

We are available to meet and confer on this issue if necessary.

Regards,
Vincent

O'Melveny

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