Exhibit B

From: Beasley, Tony <tbeasley@omm.com>
Sent: Friday, August 16, 2019 8:12 PM
To: Fussell, Tripp <JFussell@mayerbrown.com>
Cc: Godfrey, Kristin <kgodfrey@omm.com>; Beaber, Jamie B. <JBeaber@mayerbrown.com>;
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Apple-Service <Maxell-Apple-Service@mayerbrown.com>; Miller, Tiffany A.
<TMiller@mayerbrown.com>
Subject: Re: Maxell Ltd. v. Apple Inc. (Case 5:19-cv-00036-RWS) - Source Code

EXTERNAL SENDER

Hi Tripp,

We do not agree with your characterization of the July 19 meet and confer. During that meet and confer,
Maxell (1) committed to providing more information for why it contended it was proper to invoke PR 3-
1(g) for the five identified claim limitations; (2) noted several times that it was treating its invocations of
PR 3-1(g) as reservations of rights to cite source code as evidence of alleged infringement if its review so
warranted; and (3) stated its position that Apple must produce all relevant source code irrespective of what
was stated in Maxell's infringement contentions. Apple agreed that if it identified any additional
limitations as to which it believed Maxell had improperly invoked PR 3-1(g), we would let you
know. Apple did not agree to summarize what source code it was or was not producing on "an element-
by-element basis," as your email seems to suggest, nor is Apple required to do so. Based on your
representation that Maxell's invocation of PR 3-1(g) was a reservation of rights, Apple has not identified
any further limitations as to which it believes PR 3-1(g) was improperly invoked. As such, there was
nothing further to report to Maxell.

Your request also exceeds the scope of Apple's discovery obligations under PR 3-4. Apple has produced
documents and made available for inspection source code that is sufficient to show the operation of the
aspects or elements of the accused products as identified in Maxell's infringement contentions, and there is
no "additional information" that Apple needs to—or is required to—provide under the court's order, the
local rules, or the parties' discussion.   We informed you weeks ago that we would be producing source
code on August 14, and Apple has already cleared Maxell's experts. Thus, we disagree with your position
that Apple must provide additional information before Maxell can give notice of inspection.

Thanks,

Tony