

# EXHIBIT C

**Miller, Tiffany A.**

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**From:** Pensabene, Marc J. <mpensabene@omm.com>  
**Sent:** Tuesday, February 18, 2020 3:24 PM  
**To:** Siddiqui, Saqib; Silverman, Daniel; Levy, Kfir B.; Simmons, Luann L.; 'melissa@gillamsmithlaw.com'; Beasley, Tony; Moon, Bo; Gore, Laura Bayne; Zhou, Vincent; #Maxell-Apple; 'Bobby Lamb'; Godfrey, Kristin; bstevens@wscllp.com; hcannom@wscllp.com; jqulici@orrick.com; Williamson, Brett J.  
**Cc:** FW-CLIENT-Maxell-Apple-Service; 'Geoff Culbertson'  
**Subject:** RE: Maxell Ltd. v. Apple Inc. (Case 5:19-cv-00036-RWS) - Interrogatory Response No. 12

**\*\*EXTERNAL SENDER\*\***

Saqib,

You are not correct in your understanding. As clearly stated in our response to interrogatory 12, the February 6 supplement included source code made available for inspection as of January 31. We will be providing a further supplemental response in view of the recently produced code.

Best  
Marc

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**From:** Siddiqui, Saqib <SSiddiqui@mayerbrown.com>  
**Sent:** Tuesday, February 18, 2020 2:57 PM  
**To:** Silverman, Daniel <dsilverman@omm.com>; Pensabene, Marc J. <mpensabene@omm.com>; Levy, Kfir B. <KLevy@mayerbrown.com>; Simmons, Luann L. <lsimmons@omm.com>; 'melissa@gillamsmithlaw.com' <melissa@gillamsmithlaw.com>; Beasley, Tony <tbeasley@omm.com>; Moon, Bo <bmoon@omm.com>; Gore, Laura Bayne <lbayne@omm.com>; Zhou, Vincent <vzhou@omm.com>; #Maxell-Apple <maxellapple@omm.com>; 'Bobby Lamb' <wrlamb@gillamsmithlaw.com>; Godfrey, Kristin <kgodfrey@omm.com>; bstevens@wscllp.com; hcannom@wscllp.com; jqulici@orrick.com; Williamson, Brett J. <bwilliamson@omm.com>  
**Cc:** FW-CLIENT-Maxell-Apple-Service <Maxell-Apple-Service@mayerbrown.com>; 'Geoff Culbertson' <gpc@texarkanalaw.com>  
**Subject:** RE: Maxell Ltd. v. Apple Inc. (Case 5:19-cv-00036-RWS) - Interrogatory Response No. 12

**[EXTERNAL MESSAGE]**

Counsel,

We are in receipt of Apple's Third Supplemental Response to Interrogatory No. 12 dated February 6, 2020. It is our understanding from your letter dated February 14, 2020, that Apple considers its February 6<sup>th</sup> Supplemental Response as complete and final and will not be supplementing its response to this interrogatory again (with the exception of the third-party source code relating to the [REDACTED] functionality).

Please let us know if our understanding is incorrect and whether Apple intends to supplement again because as you know this interrogatory response provides the key that ties the source code to the accused products.

Best,  
Saqib