

EXHIBIT B



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VIA EMAIL

Jamie B. Beaber
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Re: Maxell, Ltd. v. Apple Inc., Case No. 5:19-cv-00036-RWS (E.D. Tex.)

Dear Mr. Beaber:

We write in response to your July 15, 2019 letter. We agree this Court's Discovery Order is intended to streamline the discovery process, but we disagree with Maxell's apparent position that July 10 was the deadline for Apple to produce **all** responsive and relevant documents in this case. We are unaware of any authority interpreting the deadline for Additional Disclosures in this manner. If you have case law to support your position, please send those cases to us.

To reiterate what we stated in our July 12, 2019 letter, Apple does not intend to delay its document production in any way. Maxell only served its Infringement Contentions a little over a month ago, on June 12, and these contentions identified over 120 different models of accused products, many of which were not identified in Maxell's Complaint. We had begun the document collection process for products identified in the Complaint long ago, and we are continuing to diligently collect and review documents to cover the expanded and wide breadth of allegations in this case. We intend to continue a rolling production in as expeditiously a manner as possible and practical. We believe that this type of rolling production is more than sufficient under—and consistent with the purposes of—the Docket Control Order, Local Patent Rules, and Federal Rules of Civil Procedure.

To answer your specific questions, Apple does intend to comply with Local Patent Rule 3-4 by August 14, 2019. (This will include user manuals, which are now stored in a proprietary format and require additional processing time.) **As to the remaining document categories iterated in your July 11 letter, as I also stated previously, we are currently unaware of any areas where the parties are at an impasse.** We plan to continue our rolling production before August 14, and will continue thereafter to produce documents on an ongoing basis. We do not believe it is necessary or helpful to set arbitrary deadlines for these productions. As you know, Judge Schroeder did not set (and does not typically set) a deadline for the substantial completion of document production, nor do we believe such a deadline is necessary in this case. If the only perceived conflict on Maxell's end is the rate at which documents are being produced, we suggest (1) providing authority, as requested above, interpreting the Additional Disclosure



deadline in the manner you suggest; and/or (2) tabling any demand for a meet-and-confer until at least after August 14, 2019, by which date Apple expects to have produced substantially more documents.

Sincerely,

/s/ Tony Beasley

Tony Beasley