

EXHIBIT C



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File Number:

July 18, 2019

Tony Beasley
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VIA E-MAIL

Jamie B. Beaber
Mayer Brown LLP
1999 K Street, N.W.
Washington, D.C. 20006-1101

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

Dear Mr. Beaber:

I write to provide a response to your June 18, 2019 letter. As you know, pursuant to Paragraphs 1-3 and 5 of the Discovery Order (Dkt. 42), requests for production are unnecessary as the parties are expected to produce documents that “are relevant to the pleaded claims or defenses involved in this action” without the need for any requests for production (Discovery Order at Paragraph 3(b)). Apple is complying and will continue to comply with all of its discovery obligations under the Court’s orders and rules.

Apple will treat your Requests for Production (“RFPs”), in conjunction with your subsequent correspondence and our collective and ongoing discussions related thereto, as notice of what materials Plaintiff believes are relevant and should be produced. As discussed in separate correspondence, Apple has been in the process of collecting relevant, responsive, non-privileged documents for production and began its rolling production on July 10, 2019. **Apple will continue to produce documents sufficient to show information “relevant to the pleaded claims or defenses involved in this action” on a rolling basis and without awaiting further requests.** To the extent that any questions or disputes arise over the scope of Apple’s production, Apple will address those through the correspondence chain that began with your July 11, 2019 letter.

Thanks,

/s/ Tony Beasley

Tony Beasley