

EXHIBIT C



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

Main Tel +1 202 263 3000
Main Fax +1 202 263 3300
www.mayerbrown.com

Jamie B. Beaver
Direct Tel +1 202 263 3153
Direct Fax +1 202 263 5209
jbeaver@mayerbrown.com

September 23, 2019

VIA E-MAIL

Tony Beasley
O'Melveny & Myers LLP
400 South Hope Street
18th Floor
Los Angeles, CA 90071-2899
tbeasley@omm.com

Re: *Maxell, Ltd. v. Apple Inc.*, Case No. 5:19-cv-00036-RWS (E.D. Tex.) –
Supplementation of Maxell Infringement Contentions

Dear Tony:

This month, Apple has announced the release of several new products: iPhone 11, iPhone 11 Pro, iPhone 11 Pro Max, Apple Watch Series 5, and iPad 10.2. Based on publicly available technical specifications, we are under the belief that these newly released products operate in substantially the same way for purposes of infringement as prior models of the iPhone, Apple Watch, and iPad. Accordingly, Maxell intends to move the Court for leave to supplement its infringement contentions to add the newly released products.

The iPhones and watch were made available on September 20, 2019 and the iPad is being made available on September 30, 2019. In order to provide Maxell sufficient time to analyze the released products themselves, Maxell proposes that it provide Apple with its supplementation on or before October 31, subject to any delays in Maxell's receipt of the products.


Please let us know if you will oppose Maxell's motion for leave to add the newly released products to its infringement contentions by October 31, 2019.

Assuming the Court permits Maxell to add the newly released products to the case, we also request that Apple supplement its document production, source code production, and interrogatory responses to provide relevant documents and information as they relate to these products. We request that Apple's supplementation be complete by November 15, 2019. Please let us know if Apple agrees to this proposal.

T. Beasley
September 23, 2019
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We are, as always, available to meet and confer on this issue if necessary.

Sincerely,



Jamie B. Beaber

cc: Counsel of Record