

From: Blair Jacobs <bjacobs@McKoolSmith.com>
Sent: Tuesday, April 11, 2023 10:58 PM
To: Chen, Reuben <rchen@cooley.com>; Casey L. Shomaker <cshomaker@McKoolSmith.com>; Keefe, Heidi <hkeefe@cooley.com>; Leeper, Allie Dunworth <aleeper@cooley.com>; Armon, Orion <oarmon@cooley.com>; Knight, Dustin M <dknight@cooley.com>; Christina Ondrick <condrick@McKoolSmith.com>; John Holley <jholley@McKoolSmith.com>; Elizabeth Bernard <ebarnard@McKoolSmith.com>
Cc: Softex_MS <Softex_MS@mckoolsmith.com>
Subject: RE: Softex v. Lenovo - Amended Complaint

Thanks Reuben. We would appreciate it if we establish a protocol where people like Ryan C who have not entered an appearance on behalf of any party in the litigation not be involved directly in conversations relating to the case, as this seems like the wisest and most appropriate course of conduct going forward. We would not bring an outside law firm into a conversation if they had not entered an appearance in our cases, particularly without announcing their presence.

If Microsoft has an interest in learning more they can reach out to me directly, as I know the in-house team over there fairly well and hold them in high respect. But it is not appropriate to have attorneys from outside law firms who have not entered an appearance in a case show up during meetings in an unannounced manner.

We appreciate your understanding on a going forward basis.

Thanks very much,
Blair

McKool Smith | Blair Jacobs
Principal | Washington | ([202](tel:2023708302)) 370-8302

From: Chen, Reuben <rchen@cooley.com>
Sent: Tuesday, April 11, 2023 8:37 PM

To: Blair Jacobs <bjacobs@McKoolSmith.com>; Casey L. Shomaker <cshomaker@McKoolSmith.com>; Keefe, Heidi <hkeefe@cooley.com>; Leeper, Allie Dunworth <aleeper@cooley.com>; Armon, Orion <oarmon@cooley.com>; Knight, Dustin M <dknight@cooley.com>; Christina Ondrick <condrick@McKoolSmith.com>; John Holley <jholley@McKoolSmith.com>; Elizabeth Bernard <ebarnard@McKoolSmith.com>
Cc: Softex_MS <Softex_MS@mckoolsmith.com>
Subject: RE: Softex v. Lenovo - Amended Complaint

Hey Blair,

Ryan C is outside counsel for Microsoft and I believe Dell and HP (but he would have to confirm).

Thanks,
Reuben

From: Blair Jacobs <bjacobs@McKoolSmith.com>
Sent: Tuesday, April 11, 2023 2:42 PM
To: Chen, Reuben <rchen@cooley.com>; Casey L. Shomaker <cshomaker@McKoolSmith.com>; Keefe, Heidi <hkeefe@cooley.com>; Leeper, Allie Dunworth <aleeper@cooley.com>; Armon, Orion <oarmon@cooley.com>; Knight, Dustin M <dknight@cooley.com>; Christina Ondrick <condrick@McKoolSmith.com>; John Holley <jholley@McKoolSmith.com>; Elizabeth Bernard <ebarnard@McKoolSmith.com>
Cc: Softex_MS <Softex_MS@mckoolsmith.com>
Subject: Re: Softex v. Lenovo - Amended Complaint

[External]

Hey Reuben,

We noticed a Ryan C on the call today and I thought he was a Cooley associate. Can you please clarify for us who Ryan C is? I am concerned we may have had an interloper. Our preference is to limit calls to counsel who are representing parties in the case.

Thanks,
Blair

McKool Smith | Blair Jacobs
Principal | Washington, D.C. | Tel: [\(202\) 370-8302](tel:(202)370-8302)

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From: Chen, Reuben <rchen@cooley.com>

Sent: Thursday, April 6, 2023 12:24 PM

To: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Keefe, Heidi <hkeefe@cooley.com>; Leeper, Allie Dunworth <aleeper@cooley.com>; Armon, Orion <oarmon@cooley.com>; Knight, Dustin M <dknight@cooley.com>; Whitt, Samuel K <switt@cooley.com>; Stoll-DeBell, Kirstin L. <kirstin.stolldebelle@faegredrinker.com>; Beyer, Carrie <carrie.beyer@faegredrinker.com>; Cooney, Ryan M. <ryan.cooney@faegredrinker.com>; Ray.Bennett@wbd-us.com <Ray.Bennett@wbd-us.com>; Jacob.Wharton@wbd-us.com <Jacob.Wharton@wbd-us.com>

Cc: Softex_MS <Softex_MS@mckoolsmith.com>; John A. Zaloom <johnzaloom@mvalaw.com>; Mark Wilson <markwilson@mvalaw.com>

Subject: RE: Softex v. Lenovo - Amended Complaint

Casey,

Lenovo (United States), Inc. does not oppose Softex filing an amended complaint to make the address changes.

Best,
Reuben

From: Casey L. Shomaker <cshomaker@McKoolSmith.com>

Sent: Monday, April 3, 2023 5:59 AM

To: Keefe, Heidi <hkeefe@cooley.com>; Leeper, Allie Dunworth <aleeper@cooley.com>; Armon, Orion <oarmon@cooley.com>; Knight, Dustin M <dknight@cooley.com>; Whitt, Samuel K <switt@cooley.com>; Stoll-DeBell, Kirstin L. <kirstin.stolldebelle@faegredrinker.com>; Beyer, Carrie <carrie.beyer@faegredrinker.com>; Cooney, Ryan M. <ryan.cooney@faegredrinker.com>; Chen, Reuben <rchen@cooley.com>; Ray.Bennett@wbd-us.com; Jacob.Wharton@wbd-us.com

Cc: Softex_MS <Softex_MS@mckoolsmith.com>; John A. Zaloom <johnzaloom@mvalaw.com>; Mark Wilson <markwilson@mvalaw.com>

Subject: Softex v. Lenovo - Amended Complaint

[External]

Counsel,

It has come to our attention that the addresses provided for Lenovo Group, Ltd. and Lenovo PC HK Limited in Softex's First Amended Complaint inadvertently fail to specify "Hong Kong SAR, China." Softex seeks to correct these addresses to ensure they accurately reflect the mailing addresses of these entities. Please confirm that you agree to the correction.

Softex also notes that the correction will not disrupt the current briefing schedule on Lenovo's motion. See, e.g., *Fed'n of State Massage Therapy Boards v. Mendez Master Training Ctr., Inc.*, No. 4:17-CV-2936, 2018 WL 3862101, at *1 (S.D. Tex. Aug. 14, 2018). Please confirm you agree.

We will confirm with our local counsel that a motion for leave to file a corrected amended complaint

is not necessary.

Thank you,



Casey L. Shomaker
Associate
Dallas, TX
Tel: (214) 978-4218
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