

From: [Min, Don H.](#)
To: [Donald McPhail](#)
Cc: [MaxellCoretronicMGTeam](#); [FW-CLIENT-Maxell-CORE-Service](#); [Geoff Culbertson \(EXTERNAL CONTACT\)](#); [Kelly Tidwell \(EXTERNAL CONTACT\)](#); [Andy Tindel](#); [{F6364945}.Active@ef.merchantgould.com](#)
Subject: RE: Maxell v. Coretronic - Letter re Defendants' discovery [IMAN-DB1.FID6364945]
Date: Tuesday, June 3, 2025 1:58:26 PM
Attachments: [Honeywell Int'l Inc. v. Acer Am. Corp., 655 F. Supp. 2d 650 \(E.D. Tex. 2009\).pdf](#)
[EVS Codec Techs., LLC v. OnePlus Tech. \(Shenzhen\) Co., No. 219-CV-00057-JRG, 2020 WL 6365514 \(E.D. Tex. Apr. 9, 2020\).pdf](#)

Don,

Based on today's meet and confer, please find below a summary of the agreements reached:

- You committed to providing supplemental responses to Rogs 18 and 23 by no later than June 13
- I have attached the relevant case law to support our positions for Rogs 24 and 25; we look forward to your response by no later than June 13
- We committed to moving forward with defendants' depositions during the week of June 23rd (with the exception to those related to the additional source code inspection and financials) and you committed to providing us with the topics for each 30(b)(6) designee by the end of this week.
- You committed to providing a confirmation early next week for the availability of source code inspection in your Minneapolis office.

We look forward to your responses. Thanks.

Regards,
Don

Don H. Min

Partner

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