

# EXHIBIT N

**Rosemary M. Rivas**

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**From:** Ott, Carter [Carter.Ott@dlapiper.com]  
**Sent:** Thursday, December 09, 2010 4:14 PM  
**To:** James Quadra  
**Cc:** James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Rebecca Coll; Daniel L. Warshaw (dwarshaw@pswplaw.com); Sacks, Luanne  
**Subject:** RE: Sony Other OS

James,  
Unfortunately, we cannot agree to many of your proposed additions to the SCEI stipulation, in particular, your proposal that SCEI's actions are imputed to SCEA. As I understand from Jim's email, this will not hold up our stipulation regarding briefing and hearing our discovery motions. Please confirm your agreement to the stipulation and proposed order I sent you Monday morning, provided I change the deadline for filing the motions from December 10 to December 15.

We recently received an additional production from your office apparently containing Baker, Stovell, and Ventura documents. Please confirm that your document production is now complete. Also, please let us know if you intend to provide us with an index of the documents you have produced, per our prior request.

Finally, we have previously asked that you provide us with your clients' addresses and telephone numbers to assist us with finding records related to them. Please let us know if you are willing to provide us with this information.

Thank you,  
Carter



**Carter W. Ott**  
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**From:** James Quadra [mailto:jquadra@calvoclarck.com]  
**Sent:** Wednesday, December 08, 2010 4:00 PM  
**To:** Ott, Carter  
**Cc:** James Pizzirusso (jpizzirusso@hausfeldllp.com); Rosemary M. Rivas; Rebecca Coll; Daniel L. Warshaw (dwarshaw@pswplaw.com)  
**Subject:** Sony Other OS

Carter:

The proposal that we would waive all potential claims against SCEI is not something we discussed

previously. Obviously, we are only prepared to do so if SCEA agrees that it is the proper party at interest and any statements, actions, etc. that may have created liability are imputed to SCEA and that SCEA will not raise as a defense that "it wasn't us - it was SCEI." We do not think that SCEI/SCEA were attempting to foreclose potential liability here or somehow use this against us, but we need to make sure that any stipulation clearly addresses this. Otherwise, we are prepared to brief and argue this in front of Chen. We have proposed language in the stipulation that will address this issue.

Further, your stipulation seems to limit discovery solely to the first set of document requests. We cannot agree to limit the SCEI discovery solely to that set - particularly if, as discovery progresses, we find additional areas of relevant discovery to pursue. We have proposed language addressing that issue, as well.

Given the schedule you are proposing, we need to know your position on this by tomorrow at 5 pm PT.

Regards

Jim

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