

# Exhibit 19

# FISH & RICHARDSON P.C.

12390 El Camino Real  
San Diego, California  
92130

Frederick P. Fish  
1855-1930

W.K. Richardson  
1859-1951

## VIA EMAIL AND FEDERAL EXPRESS

Telephone  
858 678-5070

Facsimile  
858 678-5099

Web Site  
www.fr.com

January 30, 2008

James E. Magleby  
Magleby & Greenwood, P.C.  
170 South Main Street, Suite 350  
Salt Lake City, UT 84101-3606

Re: Apple Inc. v. Podfitness, Inc. - Interrogatories  
Our Ref.: 21669-001LL1



Dear Jim:

ATLANTA

AUSTIN

BOSTON

DALLAS

DELAWARE

MUNICH

NEW YORK

SAN DIEGO

SILICON VALLEY

TWIN CITIES

WASHINGTON, DC

We are writing on behalf of Apple Inc. ("Apple") in response to your letter dated January 17, 2008. Apple reiterates in full its objections to Podfitness' First Set of Interrogatories, and any responses set forth herein are made without waiver of any objection on any ground as to relevancy, privilege, or admissibility of any information provided in response to Podfitness' requests in any subsequent proceeding or at the trial of this or any other action.

**Interrogatory No. 12:** Apple objects to this interrogatory as irrelevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence. Apple must insist that Podfitness substantiate any claims of relevancy with respect to this subject matter before it agrees to produce any responsive documents.

**Interrogatory No. 14:** Subject to its objections, Apple sets forth documents responsive to this Interrogatory in Exhibit A, attached hereto.

**Interrogatory No. 15:** Apple reiterates its objection that this Interrogatory is overly broad and burdensome to the extent that it requests figures on a month-by-month basis. Subject to its objections, Apple sets forth documents responsive to this Interrogatory in Exhibit B, attached hereto.

We trust that this letter adequately responds to your concerns. Please contact us if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew M. Abrams', written over a white background.

Andrew M. Abrams