

# Exhibit F



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June 21, 2005

OUR FILE NO. 349284-901707

Via Facsimile and U.S. Mail

Susan Callender, Esq.  
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Wilson Sonsini Goodrich & Rosati  
650 Page Mill Road  
Palo Alto, CA 94304-1050

**Re: Zoran Corporation, et al. v. MediaTek, et al.**  
**USDC Case Nos. C-04-02619 RMW (PVT) and C-04-04609**

Dear Susan and Jerry:

This letter confirms our teleconference this morning regarding Plaintiffs' ongoing efforts to obtain complete responses to discovery served in the above-entitled action. If your understanding of the agreements set forth below differ in any material respect, please contact me immediately.

1) With respect to Plaintiffs' First Set of Interrogatories and First Set of Document Requests to Defendants MediaTek, Inc., Mintek Digital, Inc., Asustek Computer, Inc., Lite-On Information Technology Corp., TEAC Corporation, TEAC America, Inc., Terapin Technology PTE., Ltd. Corporation, and Teroptix L.P. d/b/a Terapin Technology's (collectively, "Defendants"), Defendants agreed to supplement their discovery responses in accordance with your February 4, 2005 meet and confer letter. To date, Defendants still have not provided their promised supplemental responses. Defendants agreed to supplement their responses by Monday, June 27, 2005.

Plaintiffs, however, maintain that Defendants' interrogatory responses invoking Rule 33(d) are improper as Plaintiffs cannot ascertain the requested information from any documents produced or identified by MediaTek. Plaintiffs reserve the right to compel full and complete narrative responses to each of the interrogatories. Plaintiffs will evaluate Defendants' forthcoming supplemental responses and respond to any remaining deficiencies.

2) With respect to Plaintiffs' First Set of Interrogatories and First Set of Document Requests to Defendants ASUS Computer International, Inc., Atronix Technology, Inc., Micro-Star International Co., Ltd., EPO Science and Technology Co., Inc., and MSI Computer Corporation and Plaintiffs' Second Set of Document Requests to Defendants MediaTek, Inc., Asustek Computer, Inc., Lite-On Information Technology Corp., Teac Corporation and Teac America, Inc., Defendants' agreed to produce all technical documentation relating to MediaTek's MT1888 product, including all Verilog code, firmware code, technical specifications, schematics and data sheets. Plaintiffs agreed to treat this information according to the same confidentiality provisions agreed to by the parties in the 506 ITC Investigation.



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Susan A. Callender, Esq.  
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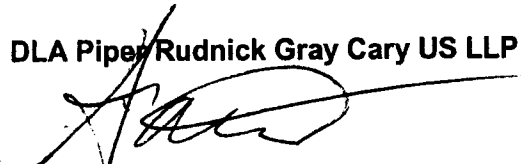
Defendants agreed to respond no later than Monday, June 27 with a date on which Plaintiffs will receive the technical discovery related to the MT1888.

3) With respect to all outstanding document requests, including all requests specifically relating to MediaTek's MT1888 chip and design around efforts, Plaintiffs requested that a privilege log be served in accordance with the Federal Rules of Civil Procedure. Plaintiffs stated their position that such a log identify all responsive documents created or dated through the present, and specifically not limited to a time period prior to any filing date in this action. Defendants contend that preparation of an adequate privilege log would be burdensome and indicated they may seek a protective order to limit the time period for which a privilege log should be maintained.

As Defendants obligation to timely serve a complete privilege log is clear (*See Burlington Northern v. United States District Court*, 2005 WL 1175922 (9th Cir. 2005)), please notify me by Monday, June 27 whether (and when) Defendants will agree to provide a privilege log, or whether Defendants intend to move for a protective order.

Very truly yours,

**DLA Piper Rudnick Gray Cary US LLP**



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