

# Exhibit G



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OUR FILE NO. 349284-901707

Via Facsimile and U.S. Mail

Jerry Chen, Esq.  
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 Jerry:

This letter confirms our teleconference yesterday, during which we discussed outstanding issues relating to Plaintiffs' interrogatories and requests for production of documents. If your understanding of the below differs, please notify me immediately.

- 1) As I informed you yesterday, we received firmware code for MediaTek's MT1888 chip relating to the DSP, but not for the microcontroller. You agreed to look into the issue and respond in a couple of days as to when we can expect the complete production of firmware code for the microcontroller.
- 2) While certain of Plaintiffs' discovery requests are directed specifically to the MT1888 chip, we asked for confirmation that this chip is the only MediaTek product that constitutes a design around, or contains design changes, to avoid, or in light of, the claims of the patents-in-suit. In this regard, I specifically noted Plaintiffs' Interrogatory No. 3 and Document Request No. 30 to MediaTek, which are not limited to the MT1888 chip. I note also that Document Request No. 26 to MediaTek seeks "[a]ll documents referring or relating to any design changes to any accused product designed, sold, or licensed by MediaTek, including any effort to design around the Patents-in-Suit." We are seeking this confirmation because to date we have only received technical documents concerning the MT1888 product, and MediaTek has thus far only identified the MT1888 product as a design around product. You agreed to look into this issue and respond in a couple of days. Obviously, to the extent there are other products, Plaintiffs' demand the immediate supplementation of interrogatory responses and documents as appropriate.
- 3) Finally, I pointed out that we still have not received any documents from MediaTek, or any other Defendants, concerning (1) communications relating to the MT1888 or other design around products, (2) communications relating to MediaTek's efforts to design around the patents-in-suit, or (3) sales or shipping documents related to the MT1888 (or other design around products). I noted the conspicuous absence of such documents in light of MediaTek's May 17, 2005 press release, which stated that MediaTek "already developed a design around" and that MediaTek "already provided its customers with the new generation chipsets...."



**PIPER RUDNICK  
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As I advised yesterday, Plaintiffs intend to file a motion to compel further and complete discovery responses with respect to the other issues relating to damages and willfulness that were the subject of the parties' previous discussions. I appreciate your prompt response to the above issues so that all outstanding discovery disputes can be resolved at one time. However, given the more than six months that many of these issues have been outstanding, please be advised the Plaintiffs' intend to file their motion this week.

Very truly yours,

**DLA Piper Rudnick Gray Cary US LLP**

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