

# Exhibit H

September 2, 2005

**VIA FACSIMILE AND E-MAIL**

Aaron Wainscoat, Esq.  
DLA Piper Rudnick Gray Cary US LLP  
2000 University Avenue  
East Palo Alto, CA 94303

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

Dear Aaron:

This letters confirms our discussion during the conference call yesterday afternoon concerning issues raised in your August 30, 2005 letter on the subject of Plaintiffs' discovery requests.

1. With respect to your assertion that MediaTek has not produced microcontroller firmware for the MT1888 and has only produced DSP firmware, we confirmed that MediaTek did in fact produce microcontroller firmware for the MT1888 when we produced the updated technical information in July. During the call, you expressed Plaintiffs' concern that the firmware code produced might not include specific code related to a particular function. You agreed to provide more specific information regarding the portion of the firmware code Plaintiffs contend is missing. We agreed to confirm that all relevant sections of the microcontroller firmware were produced.

2. Regarding the issue of products, other than the MT1888, that may contain the design-around of the patents-in-suit, we are in the process of verifying whether other MediaTek design-around products have recently been released. Due to typhoon Talim which hit Taiwan the day before, we have not yet been able to confirm this issue with the client but will notify you as soon as we have a definitive answer.

3. With respect to your request for communications regarding MediaTek's efforts to design around the patents-in-suit, MediaTek maintains its previous objection that these communications are privileged. However, MediaTek will produce relevant documents for design-around products like the MT1888 in a manner consistent with the production for other MediaTek products accused in this case.

Aaron Wainscoat, Esq.  
September 2, 2005  
Page 2

4. With regards to the issue of listing privileged documents created after the initiation of this lawsuit on a privilege log, Defendants maintain their position that there was an understanding between the parties that those documents did not need to be listed on a privilege log. This was the agreement between the parties in the parallel ITC Investigation 337-TA-506. Discovery in the present district court case has been conducted based on the discovery cross use agreement with that ITC Investigation. The course of conduct between the parties has, until recently, honored this understanding. During the call, Plaintiffs made clear that their current position is that there is no specific agreement in the district court action that documents created after the filing of the complaint do not need to be listed on a privilege log.

5. With respect to sales and financial information related to damages, both for the MT1888 and other MediaTek products, Defendants have and will continue to update their production. During the call, we agreed that it would be burdensome to require Defendants to update this information on an ongoing basis. We decided that it would be more efficient if this information were updated at a specific time (one month to six weeks) prior to when damages depositions are actually scheduled. To that end, we will engage in further discussion regarding the nature and timing of future updates of Defendants' sales and financial information.

6. During the conference call, specific issues related to Plaintiffs' interrogatories were also raised. These specific issues are set forth below.

Interrogatory No. 1.

This interrogatory requests that Defendants provide all facts and information supporting their denial that they willfully infringed the patents-in-suit. Understanding that the scope of this request potentially encompasses all facts and information related to invalidity and non-infringement, Plaintiffs have narrowed this request so that it is read with the assumption that the asserted patents are both valid and infringed. Defendants will supplement their response as appropriate.

Interrogatory No. 2.

This interrogatory requests information as to when the Defendants first learned of the patents-in-suit and any action that was taken as a result. A number of the Defendants have already supplemented their response to this request. The other Defendants will also supplement their responses.

Interrogatory No. 3 (MediaTek only).

Aaron Wainscoat, Esq.  
September 2, 2005  
Page 3

Plaintiffs stated that this interrogatory requests information describing the details of any design changes for design-around products. MediaTek has already provided very specific technical information for the MT1888 design-around product. The investigation into the possibility of other design-around products is ongoing. MediaTek will supplement this response to reference the production bates range for the technical information responsive to this request.

Remaining interrogatories.

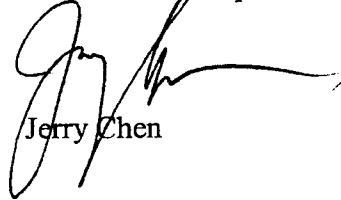
We agreed that the remaining interrogatories deal with issues that will likely be addressed through our continuing discussions related to damages discovery. We will revisit these issues at a later point if necessary.

7. With respect to any outstanding issues related to Plaintiffs' document requests, we agreed that these issues will likely be resolved once we resolve the various issues detailed in this letter. We will revisit these issues at a later point if necessary.

Please feel free to call me to further discuss any of the issues detailed in this letter.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation



Jerry Chen

cc: Mark Zolno, Esq. (via e-mail)  
William Wright, Esq. (via e-mail)