

EXHIBIT C

From: Rathinasamy, Palani P.
Sent: Tuesday, March 15, 2011 7:00 PM
To: 'Greenblatt, Nathan'
Cc: Elan Apple Team; Apple Elan WGM Service
Subject: Interrogatory No. 13

Nathan,

I write regarding deficiencies in Apple's response to Elan's Interrogatory No. 13. Interrogatory No. 13 requires that Apple:

"Identify by each unique product name, product code, product model and/or any other product nomenclatures each Apple Product designed, made, used, sold, offered for sale, imported, or distributed by Apple."

While Apple has identified products by broad model name (e.g. PowerBook) and by internal development code, it has not provided the full model names or the external product numbers it used to differentiate among version of those products. For example, Apple's web site lists three different specification sheets for PowerBook computers released in April of 2004. Those include the PowerBook G4 12 Inch, 17 inch and 15 inch versions. Those specifications further refer to various model numbers, for example M9183LL/A, M9184LL/A, M9421LL/A, M9422LL/A and M9462LL/A. However, Interrogatory No. 13 requests all product model names/numbers used to identify these products. As Apple did not identify at least the aforementioned model numbers, Apple has not provided a complete response and should immediately update these responses to include all external model names and numbers used to identify the Accused Products. I am available this Thursday, 1:00 PM PST, to meet and confer regarding this issue.

Best Regards,

Palani

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