

EXHIBIT D

From: Greenblatt, Nathan [nathan.greenblatt@weil.com]
Sent: Thursday, March 24, 2011 2:11 PM
To: Rathinasamy, Palani P.
Cc: Elan Apple Team; Apple Elan WGM Service
Subject: RE: Interrogatory No. 13

Palani,

As your email below notes, Apple has provided model names and internal development code names for the accused products, which is more than sufficient to allow Elan to review our document production and source code for information relevant to the design, development, function, structure and operation of the accused functionalities. It is unclear how Elan believes external model numbers would be relevant to the issues in the case, but as you note, they are available from Apple's website by searching for each product at <http://support.apple.com/specs>. To the extent there is some external model number information that you believe is missing from the website, please let us know specifically what it is and why you believe you need it and we will consider your request.

Best,

Nathan

The logo for Weil, consisting of the word "Weil" in white text on a green rectangular background.

Nathan A. Greenblatt

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From: Rathinasamy, Palani P. [mailto:Palani.Rathinasamy@alston.com]
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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