

# EXHIBIT 15

**From:** Bu, Jane [<mailto:Jane.Bu@alston.com>]  
**Sent:** Friday, May 27, 2011 6:15 PM  
**To:** Greenblatt, Nathan  
**Cc:** Apple Elan WGM Service; Elan Apple Team  
**Subject:** Deposition Notices Apple Issued to Elan Employees dated May 23

Nathan: I write in response to the deposition notices Apple issued to Elan employees on May 23.

Daisuke Shudo, Roven Lee, Jimmy Liu and Phoenix Lin are no longer employed by Elan. As with the 353 patent inventors, Elan has no control over their availability to appear for a deposition and Alston+Bird is not currently representing any of these individuals. The last known addresses of these former employees are as follows:

Roven Lee 李佳益  
No. 87, Nan Men Road, South District, Taichung City, Taiwan 402  
台中市南區南門里 30 鄰南門路 87 號

Jimmy Liu 劉智民  
11F, No. 45, Pao Chung Road, Xindian District, New Taipei City, Taiwan 231  
台北縣新店市寶興里寶中路 45 號 11 樓

Phoenix Lin 林維民  
9F, No. 42, Lane 431, Ching Ping Road, Zhonghe District, New Taipei City, Taiwan 235  
台北縣中和市新南里 46 鄰景平路 431 巷 42 號 9 樓

Mr. Eric Yang, Draco Wu, and Leo Chen are all employees in the same product development group. We would expect them to have similar, if not identical, information regarding Elan's touchpad products. As such, we propose to make Mr. Eric Yang available for deposition first. Mr. Yang is the head of the department and, therefore, may be the most appropriate representative among them. If Mr. Yang were unable to answer questions on any relevant topic(s), we would agree to make Mr. Wu and/or Mr. Chen available for deposition, assuming they possess the information that Mr. Yang did not.

We are also looking into Mr. Wen-Jen Chen and Mr. Nick Lin's availability. However, we would like to meet and confer regarding the locality of all of these depositions (as they related to Apple's counterclaims) and the scope of deposition with respect to Mr. Lin, a member of Elan's legal department. Most of what Mr. Lin knows will likely be privileged. We would like to explore ways for Apple to obtain non-privileged information without having to call this witness, whose deposition will likely be muddled with disputes over privileges.

Best,

*Jane H. Bu*

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