

EXHIBIT C

From: [Mazza, Mia](#)
To: [Rachel Herrick Kassabian](#)
Cc: [AppleMoFo](#); [Samsung v. Apple](#); [WH Apple Samsung NDCal Service](#)
Subject: Apple v. Samsung: Continued URGENT Need to Finalize Korea Depo Scheduling
Date: Sunday, February 05, 2012 11:52:54 AM
Attachments: [mg_info.txt](#)

Rachel:

As reflected below, I was informed by Victoria on February 1 that you would get back to me the next morning regarding finalizing the schedule for depositions in Korea. You never contacted me to discuss that topic. As you know, Apple's team is currently in Korea to take the noticed depositions of Samsung witnesses. It is important that the schedule be finalized immediately to avoid wasting the resources Apple has put forth to depose Samsung's witnesses in the place where they are located.

1. Apple has determined that it will not at this time pursue the depositions of Woncheol Chae, Chang Hwan Hwang, Eun Go, Paul Golden, David La, and Hankil Yoon, but Apple reserves its rights to seek their depositions at a later time.

2. In scheduling Korean travel and other arrangements, Apple has relied and is relying on the following schedule based on the parties' communications, including the discussion thread below:

- YoungSoon Lee (February 7)
- Sun-Young Yi (February 8)
- Hangil Song (February 7/8)
- ByongChol Hwang (February 8)
- Minhkyung Kim (February 10)
- Kiyung Nam (February 10)
- Jong-Kyun Shin (February 13, as noticed)*
- Giyoung Lee (February 16/17)
- Youngseok Bang (February 17)
- Don Joo Lee (February 17)
- Junwon Lee (February 22)
- Yun-Jung Lee (February 23/24)
- Seoggeun Kim (February 29)
- Minhyouk Lee (February 28/29)
- Seung Hun-Yoo (March 2)

3. Apple would like to depose the following five witnesses during the week of February 13, on the dates set forth below. Please let us know immediately if a different date that week works better for any of these witnesses. The dates previously provided for the first four witnesses are unacceptably late. No date has been provided for the fifth witness.

- Dong Jin Koh (February 14) [Originally noticed for December 5]*
- Joon-Il Choi (February 14) [Originally noticed for December 5]
- Dong Hoon Chang (February 15) [Originally noticed for January 9]*
- Won Pyo Hong (February 15) [Originally noticed for January 12]*

Suk Geun Kim (February 16) [Originally noticed for January 12]

4. Please let us know which of the following are alternate spellings of the same person's name and which are different Samsung employees (current or former): 김석근, Soggeun Kim, Seog Guen Kim, Seok Gun Kim, Suk Keun Kim, and Suk Geun Kim.

5. Please offer dates for the following noticed witnesses. Apple has provided Samsung with dates for all of the witnesses Samsung has noticed, regardless of objection. Please extend us the same courtesy.

- SangEun Lee (noticed for February 1, deposition to take place on or before March 2)
- SeongWon Yoon (noticed for February 1, deposition to take place on or before March 2)
- Seung-Yun Lee (noticed for February 1, deposition to take place on or before March 2)
- In-Ho Kim (noticed for February 2, deposition to take place on or before March 2)
- Jon-Sik Seong (noticed for February 3, deposition to take place on or before March 2)
- Byeong-Wook Kim (noticed for February 6, deposition to take place on or before March 2)
- Kun Ro (noticed for February 6, deposition to take place on or before March 2)
- Hyoung-Shin Park (noticed for February 6, deposition to take place on or before March 2)
- Heonbae Kim (noticed for February 6, deposition to take place on or before March 2)
- Seunghwan Cho (noticed for February 6, deposition to take place on or before March 2)
- Dae-Woon Myeong (noticed for February 7, deposition to take place on or before March 2)
- YoungHoon Eom (noticed for February 8, deposition to take place on or before March 2)*
- Min-Cheol Shin (noticed for February 8, deposition to take place on or before March 2)*
- Gee Sung Choi (noticed for February 8, deposition to take place on or before March 2)
- Sungsik Lee (noticed for February 9, deposition to take place on or before March 2)
- Younghee Lee (noticed for February 10, deposition to take place on or before March 2)*
- Sang Hung (noticed for February 10, deposition to take place on or before March 2)
- DongSeok Ryu (noticed for February 13, deposition to take place on or before March 2)
- Hoosoo Seo (noticed for February 14, deposition to take place on or before March 2)

6. Please provide witnesses and dates for the topics set forth in Apple's 8 outstanding 30(b)(6) notices. To date, Samsung has not yet provided a single witness or date for any of the notices Apple has served beginning in October 2011.

7. Apple's acknowledges Samsung's February 3 letter stating its objections to Apple deposing the eight witnesses designated with an asterisk (*) above. We will address that issue, and Samsung's proposed limitation to the scope of Mr. Don Joo Lee's February 17 deposition, in separate correspondence. Apple does not agree to any such limitation of the scope of its deposition of Mr. Lee.

Deposition scheduling is already on Apple's agenda for this Monday's lead trial counsel meeting. I hope that Samsung will, before then, provide the requested dates for these 24 witnesses so that we do not need to take up lead counsel's time on this scheduling matter.

Regards,

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From: Mazza, Mia
Sent: Wednesday, February 01, 2012 8:24 AM
To: 'Victoria Maroulis'
Cc: AppleMoFo; Samsung v. Apple; 'sam.maselli@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; Rachel Herrick Kassabian
Subject: RE: Samsung Deposition Dates - URGENT Need to Finalize Korea Deposition Scheduling

Thanks Victoria.

To be clear, the below first bullet point list does represent Apple's acceptance of the dates offered by Samsung.

We advised in correspondence last week that the first six dates in the second bullet-point list (in bold blue) offered by Samsung are not acceptable to Apple, and we have provided information regarding the ranges in which we request that Samsung search for earlier dates.

Most importantly, for the rest of the dates in the second bullet-point list (24 witnesses), Samsung has not offered any dates, so we are unable to accept any outstanding dates. If Samsung would offer dates for those 24 witnesses it would go a long way towards finalizing the Korea schedule.

Regards,

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From: Victoria Maroulis [mailto:vicoriamaroulis@quinnemanuel.com]
Sent: Wednesday, February 01, 2012 8:01 AM
To: Mazza, Mia; Rachel Herrick Kassabian
Cc: AppleMoFo; Samsung v. Apple; 'sam.maselli@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'; 'calvin.walden@wilmerhale.com'
Subject: RE: Samsung Deposition Dates - URGENT Need to Finalize Korea Deposition Scheduling

Counsel,

Rachel is traveling. She will respond to you tomorrow morning. Please accept the outstanding dates Samsung previously offered. We are unable to offer any earlier dates than what was offered so if those dates are not acceptable, please advise as soon as possible, and we will search for other dates before March 8.

Thank you.

Victoria Maroulis
Partner,
Quinn Emanuel Urquhart & Sullivan, LLP

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From: Mazza, Mia [mailto:MMazza@mofo.com]
Sent: Wednesday, February 01, 2012 7:55 AM
To: Rachel Herrick Kassabian
Cc: AppleMoFo; Samsung v. Apple; sam.maselli@wilmerhale.com; peter.kolovos@wilmerhale.com; calvin.walden@wilmerhale.com
Subject: FW: Samsung Deposition Dates - URGENT Need to Finalize Korea Deposition Scheduling
Importance: High

Rachel --

I have not heard from you in response to my below January 29, 2012, email regarding finalizing the deposition schedule for Korea. As you know, we have multiple attorneys traveling to Korea to take the noticed depositions of 50 Samsung witnesses in the N.D. Cal. case. You have provided us with reasonably acceptable dates for only 17 of them, as follows:

- Jeeyuen Wang (February 2)
- Jung Min Yeo (February 2)
- Jin-Soo Kim (February 2/3)
- YoungSoon Lee (February 7)
- Sun-Young Yi (February 8)
- Hangil Song (February 7/8)
- Minhkyung Kim (February 10)
- Kiyung Nam (February 10)
- Giyoung Lee (February 16/17)

- Youngseok Bang (February 17)
- Woncheol Chae (February 20)
- Junwon Lee (February 22)
- Yun-Jung Lee (February 23/24)
- Seoggeun Kim (February 29)
- Minhyouk Lee (February 28/29)
- Hankil Yoon (March 2)
- Seung Hun-Yoo (March 2)

We are finalizing travel schedules and planning on taking these depositions on these dates.

We would appreciate it if you would do us the courtesy of responding with dates falling within the requested ranges (identified below) for the following witnesses listed below. For those marked with an asterisk (*), we will assume the deposition is going forward on the date noticed unless you advise us by **noon on Thursday, February 2** that the witness is unavailable and provide an alternate date. Those depositions were noticed on or before January 22 and we need to get them calendared.

- **Joon-II Choi (noticed for December 5, deposition to take place on or before February 7)**
- **Dong Jin Koh (noticed for January 10, deposition to take place on or before February 7)**
- **Don Joo Lee (noticed for December 9, deposition to take place on or before February 9)**
- **Chang Hwan Hwang (noticed for January 10, deposition to take place on or before February 24)**
- **Dong Hoon Chang (noticed for January 9, deposition to take place on or before February 24)**
- **Won Pyo Hong (noticed for January 12, deposition to take place on or before February 24)**
- Suk Geun Kim (noticed for January 12, deposition to take place on or before March 2)
- SangEun Lee (noticed for February 1, deposition to take place on or before March 2)
- SeongWon Yoon (noticed for February 1, deposition to take place on or before March 2)
- Seung-Yun Lee (noticed for February 1, deposition to take place on or before March 2)
- In-Ho Kim (noticed for February 2, deposition to take place on or before March 2)
- Jon-Sik Seong (noticed for February 3, deposition to take place on or before March 2)
- David La (noticed for February 3, deposition to take place on or before March 2)
- Byeong-Wook Kim (noticed for February 6, deposition to take place on or before March 2)*
- Kun Ro (noticed for February 6, deposition to take place on or before March 2)*
- Hyoung-Shin Park (noticed for February 6, deposition to take place on or before March 2) *
- Heonbae Kim (noticed for February 6, deposition to take place on or before March 2)
- Seunghwan Cho (noticed for February 6, deposition to take place on or before March 2)
- Dae-Woon Myeong (noticed for February 7, deposition to take place on or before March 2)*

- ByongChol Hwang (noticed for February 8, deposition to take place on or before March 2)*
- YoungHoon Eom (noticed for February 8, deposition to take place on or before March 2)*
 - Min-Cheol Shin (noticed for February 8, deposition to take place on or before March 2)*
 - Gee Sung Choi (noticed for February 8, deposition to take place on or before March 2)
 - Sungsik Lee (noticed for February 9, deposition to take place on or before March 2)*
 - Younghee Lee (noticed for February 10, deposition to take place on or before March 2)*
 - Sang Hung (noticed for February 10, deposition to take place on or before March 2)
 - DongSeok Ryu (noticed for February 13, deposition to take place on or before March 2)*
 - Jong-Kyun Shin (noticed for February 13, deposition to take place on or before March 2)*
 - Eun Go (noticed for February 14, deposition to take place on or before March 2)*
 - Hoosoo Seo (noticed for February 14, deposition to take place on or before March 2)*

We hope that these dates can be confirmed and scheduled in advance of the upcoming lead trial counsel meeting. I understand our co-counsel at WilmerHale will contact you separately regarding the outstanding deposition notices served in Apple's defensive case.

Regards,

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From: Mazza, Mia
Sent: Sunday, January 29, 2012 1:13 PM
To: 'rachelkassabian@quinnemanuel.com'
Cc: AppleMoFo; 'samsungv.apple@quinnemanuel.com'; 'sam.maselli@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'; 'calvin.walden@wilmerhale.com'
Subject: RE: Samsung Deposition Dates - Need to Finalize Korea Depo Scheduling

Hi Rachel,

As you know, we have attorneys traveling to Korea beginning this week. The schedule for depositions to be taken in Korea over the next month needs to be finalized immediately.

For the following deponents, Samsung has not offered any dates. Samsung needs to provide these dates immediately. Dates in parentheses are those originally noticed.

- Suk Geun Kim (January 12)
- SangEun Lee (February 1)
- SeongWon Yoon (February 1)
- Seung-Yun Lee (February 1)

- In-Ho Kim (February 2)
- Jon-Sik Seong (February 3)
- David La (February 3)
- Byeong-Wook Kim (February 6)
- Kun Ro (February 6)
- Hyoung-Shin Park (February 6)
- Heonbae Kim (February 6)
- Seunghwan Cho (February 6)
- Dae-Woon Myeong (February 7)
- ByongChol Hwang (February 8)
- YoungHoon Eom (February 8)
- Min-Cheol Shin (February 8)
- Gee Sung Choi (February 8)
- Sungsik Lee (February 9)
- Younghee Lee (February 10)
- DongSeok Ryu (February 13)
- Jong-Kyun Shin (February 13)
- Eun Go (February 14)
- Hoosoo Seo (February 14)

For the following deponents, Apple has accepted Samsung's offered date(s) and we are planning to move forward on the dates offered and accepted.

- Jeeyuen Wang (February 2)
- Jung Min Yeo (February 2)
- Jin-Soo Kim (February 2/3)
- YoungSoon Lee (February 7)
- Sun-Young Yi (February 8)
- Hangil Song (February 7/8)
- Minhkyung Kim (February 10)
- Kiyung Nam (February 10)
- Giyoung Lee (February 16/17)
- Youngseok Bang (February 17)
- Woncheol Chae (February 20)
- Junwon Lee (February 22)
- Yun-Jung Lee (February 23/24)
- Seoggeun Kim (February 29)
- Minhyouk Lee (February 28/29)
- Hankil Yoon (March 2)
- Seung Hun-Soo (March 2)

For the following deponents, Apple has rejected Samsung's offered date and Samsung needs to provide earlier dates, for the reasons set forth in my attached letter dated January 27, 2012.

- Joon-Il Choi (noticed for December 5, March 5 proposed date rejected, need earlier date)
- Don Joo Lee (noticed for December 9, February 17 proposed date rejected, need earlier date)
- Dong Jin Koh (noticed for January 10, February 27 proposed date rejected, need earlier date)

date)

- Chang Hwan Hwang (noticed for January 10, March 7 proposed date rejected, need earlier date)
- Dong Hoon Chang (noticed for January 9, March 8 proposed date rejected, need earlier date)
- Won Pyo Hong (noticed for January 12, March 7 proposed date rejected, need earlier date)

We also need to finalize scheduling for the depositions to take place in Dallas. Below are the noticed dates. Please let us know if these dates work for you, or propose new dates immediately.

- Joseph Cheong (February 1)
- Todd Pendleton (February 2)
- Corey Kerstetter (February 3)
- Paul Chapple (February 6)
- Tim Benner (February 7)
- Justin Lee (February 8)

If we cannot get these dates finalized in advance, we would like to discuss these and other deposition issues at the upcoming lead trial counsel meeting.

From: Mazza, Mia

Sent: Wednesday, January 25, 2012 12:27 AM

To: 'rachelkassabian@quinnemanuel.com'

Cc: AppleMoFo; 'samsungv.apple@quinnemanuel.com'; 'sam.maselli@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'; 'calvin.walden@wilmerhale.com'

Subject: FW: Samsung Deposition Dates

Hi Rachel,

To continue the discussion regarding scheduling of Samsung depositions, I have updated the attached deposition scheduling chart sent earlier tonight, to include the additional Samsung witnesses whose depositions were noticed on January 22. This chart reflects the noticed deposition date for each such witness. We request that you confirm each date or provide an alternative date. It is important that these remaining depositions be calendared as soon as possible. **If the parties cannot get all remaining dates finalized by the end of this week we would like to include this on the agenda for Monday's lead trial counsel meeting.**

I've also listed the names of the outstanding deponents below, along with their notice dates, for ease of reference.

Dallas:

- Joseph Cheong (February 1)
- Todd Pendleton (February 2)
- Corey Kerstetter (February 3)
- Paul Chapple (February 6)
- Tim Benner (February 7)
- Justin Lee (February 8)

Location TBD:

- SangEun Lee (February 1)
- SeongWon Yoon (February 1)
- Seung-Yun Lee (February 1)
- In-Ho Kim (February 2)
- Jon-Sik Seong (February 3)
- David La (February 3)
- Byeong-Wook Kim (February 6)
- Kun Ro (February 6)
- Hyoung-Shin Park (February 6)
- Dae-Woon Myeong (February 7)
- ByongChol Hwang (February 8)
- YoungHoon Eom (February 8)
- Min-Cheol Shin (February 8)
- Sungsik Lee (February 9)
- Younghee Lee (February 10)
- DongSeok Ryu (February 13)
- Jong-Kyun Shin (February 13)
- Eun Go (February 14)
- Hoosoo Seo (February 14)

Outstanding items from earlier correspondence:

- Seung Hun Yoo (noticed for January 20, no date provided)
- Suk Geun Kim (noticed for January 12, no date provided)

Regards,

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From: Mazza, Mia
Sent: Tuesday, January 24, 2012 9:09 PM
To: 'Rachel Herrick Kassabian'
Cc: AppleMoFo; Samsung v. Apple; 'Samuel.Maselli@wilmerhale.com'; 'Peter.Kolovos@wilmerhale.com'; 'Walden, S. Calvin'
Subject: FW: Samsung Deposition Dates

Hi Rachel,

The dates in your January 13 email below are acceptable to Apple with the following exceptions.

1. As mentioned in my Sunday email below, Don Joo Lee, Joon-Il Choi, and Dong Jin Koh need to go earlier in the schedule. There appears to be room between February 6-9.

2. We also need to depose Chang Hwan Hwang, Won Pyo Hong, and Dong Hoon-Chang earlier in the schedule. We request that all depositions in Korea take place on or before March 2.
3. Jung-Min Yeo has been cancelled in the ITC, so we would like to take the N.D. Cal. deposition on February 3.
4. For the witnesses being deposed in both ITC and N.D. Cal., in coordination with Apple's ITC 796 team we would like to take the ITC deposition first. Therefore, the N.D. Cal. dates for Jin-Soo Kim, Yun-Jung Lee, Giyoung Lee, and Doo-Ju Byun are February 3, 10, 17, and 20, respectively.
5. You have proposed that Sun-Young Yi be deposed in Korea on February 8 instead of San Francisco on February 3. This is acceptable to Apple.
6. You have proposed that Yun-Jung Lee be deposed on February 23/24 rather than February 9/10. We would prefer to keep the original dates, which our ITC team already accepted last Friday.
7. You have indicated Samsung will be proposing a replacement date for Seung Hun Yoo. We also still have not received any date from you for Suk Geun Kim (alternative spelling could be Seok Geun Kim, spelled 김석근 in Korean). Please provide dates for both of these witnesses -- they should fall on or before March 2 as mentioned above.

Please see the attached proposed overall schedule. Dates highlighted in yellow were accepted in previous correspondence.

Regards,

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From: Mazza, Mia
Sent: Sunday, January 22, 2012 10:20 PM
To: 'Rachel Herrick Kassabian'
Cc: AppleMoFo; Samsung v. Apple; Samsung ITC
Subject: RE: Samsung Deposition Dates

Hi Rachel,

We are working on these dates and will get back to you shortly.

We have, as an initial matter, identified three depositions that need to go earlier in the schedule -- Don Joo Lee, Joon-Il Choi, and Dong Jin Koh. Please provide revised dates in the first week of February for these three depositions, or let us know why that scheduling adjustment is not possible.

In addition, about half of your dates below are identified as "still awaiting final confirmation." It is ten days later -- are these dates now confirmed on your end?

Regards,

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From: Rachel Herrick Kassabian [mailto:rachelkassabian@quinnemanuel.com]
Sent: Friday, January 13, 2012 6:58 PM
To: Mazza, Mia; Bartlett, Jason R.
Cc: AppleMoFo; Samsung v. Apple; Samsung ITC
Subject: Samsung Deposition Dates

Mia and Jason,

Pursuant to the parties' agreement to exchange all deposition dates today, below please find proposed deposition dates for the following witnesses:

Witness	Location	Date (NDCA)	Date (796 ITC)
Jeeyeun Wang	Seoul	Feb. 2	
Jung Min Yeo	Seoul	Feb. 2	Feb. 3
Sun-Young Yi	San Francisco	Feb. 3	
Seung Hun Yoo	Seoul	Feb. 7	
YoungSoon Lee	Seoul	Feb. 7	
Yunjung Lee	Seoul	Feb. 9	Feb. 10
Minhkyung Kim	Seoul	Feb. 10	
Kiyung Nam	Seoul	Feb. 10	
Giyong Lee	Seoul	Feb. 16	Feb. 17
Youngseok Bang	Seoul	Feb. 17	
Don Joo Lee	Seoul	Feb. 17	
Jinsoo Kim	Seoul	Feb. 2	Feb. 3
<i>Woncheol Chae</i>	<i>Seoul</i>	<i>Feb. 20</i>	
<i>Junwon Lee</i>	<i>Seoul</i>	<i>Feb. 22</i>	
<i>Hangil Song</i>	<i>Seoul</i>	<i>Feb. 22</i>	
<i>Paul Golden</i>	<i>Texas</i>	<i>Feb. 24</i>	
<i>Dong Jin Koh</i>	<i>Seoul</i>	<i>Feb. 27</i>	
<i>Seoggeun Kim</i>	<i>Seoul</i>	<i>Feb. 29</i>	
<i>Minhyouk Lee</i>	<i>Seoul</i>	<i>Feb. 29</i>	
<i>Hankil Yoon</i>	<i>Seoul</i>	<i>Mar. 2</i>	

<i>Joon-Il Choi</i>	<i>Seoul</i>	<i>Mar. 5</i>	
<i>Chang Hwan Hwang</i>	<i>Seoul</i>	<i>Mar. 7</i>	
<i>Won Pyo Hong</i>	<i>Seoul</i>	<i>Mar. 7</i>	
<i>Dong Hoon Chang</i>	<i>Seoul</i>	<i>Mar. 8</i>	

Italicized dates/ names are still awaiting final confirmation and may be subject to change.

Please note that just because a date is offered above, it does not mean that Samsung has waived its objections to producing these witnesses. To the contrary, Samsung reserves all rights to object to producing these witnesses, including on relevance, cumulativeness or apex grounds, among others. We will notify Apple regarding any witnesses Samsung declines to produce in due course.

Further, we have just received a few additional deposition notices yesterday, which arrived after we agreed to exchange deposition dates today. We have not yet had a chance to consult with our client on these and will get back to you next week. If you believe our list is missing any other deponents, please advise.

Finally, please note that Samsung will not be providing a deposition date for Mr. Sohn, as Samsung has already made a final determination that his deposition is an improper apex deposition, per our correspondence earlier today.

Please send proposed deposition dates for all noticed Apple witnesses, per the parties agreement, today.

Regards,

Rachel Herrick Kassabian | Partner
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