

EXHIBIT G

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Rohan Kale, Esq.
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Via Email

Re: *Subpoenas: Nokia Corporation v. Apple Inc. (Civ. Action No. 1:09-cv-00791)(D.D.C.)*
Our Ref: 2607.271REX0

Dear Rohan:

I am handling the objections and responses to the March 24, 2011 subpoenas you served on Robert Sterne, Glenn Perry, Rich Coller, and Sal Bezos (the "Subpoenas") in the referenced matter. Those subpoenas seek both the production of documents and a deposition of the subpoenaed individuals. The documentary portions of the Subpoenas are objected to as follows:

1. The Subpoenas' "Instructions" and "Definitions" are objected to insofar as they purport to impose burdens in responding that are greater than the burdens imposed by the Federal Rules of Civil Procedure.
2. The Subpoenas are objected insofar as the requests are vague and ambiguous.
3. The Subpoenas are objected to as all document requests seek information protected by the attorney-client privilege and the attorney-work-product doctrine.
4. The Subpoenas are objected to insofar as the document requests seek the production of documents already produced in the referenced litigation.
5. The Subpoenas are objected to insofar as the document requests seek the production of documents that are already in the public domain, including for instance on the U.S. Patent Office's Public PAIR system or on PACER.

6. The Subpoenas are objected to insofar as Nokia contends a privilege log is required for any privilege or work-product objection. The parties to the litigation have agreed to dispense with privilege logs. All documents sought by the Subpoenas are Apple's documents. Therefore, the parties agreement concerning privilege logs covers the documents requested by these Subpoenas.
7. The Subpoenas are objected to insofar as they request "prior art" to the '703 patent, without adequately narrowing the scope of the prior art requested, thereby making those requests overbroad and unduly burdensome.
8. The Subpoenas are objected as overbroad and unduly burdensome because they do not limit the documents sought for production to the files concerning the '703 patent reexamination. In searching for responsive, non-privileged documents, only the file relating to the '703 patent reexamination will be searched.
9. The Subpoenas are also objected to because they do not allow a reasonable time for production.

Subject to and without waiving the foregoing objections, responsive non-privileged documents, if any, will be produced.

The depositions that the Subpoenas seek are also objectionable. Each subpoenaed witness represents Apple, as patent power, in the reexaminations of the patents asserted in the referenced litigation. Any questions concerning those matters will necessarily touch on matters that are protected from disclosure by the attorney-client privilege and the attorney-work-product doctrine. Moreover, these depositions are premature, given these reexaminations are on-going matters, except for the reexamination of the '854 patent. In addition, the request for deposition is objected to as being for the purpose of harassing Apple's attorneys. Finally, even assuming the depositions you seek are proper, the dates you have noticed conflict with each person's schedule. The subpoenaed witnesses will not appear for a deposition unless and until we resolve these issues.

If you wish to meet and confer as required under the Federal Rules of Civil Procedure, please do not hesitate to contact me.

Rohan Kale, Esq.
April 8, 2011
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Very truly yours,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

A handwritten signature in blue ink, appearing to read "Byron L. Pickard". The signature is stylized and cursive, with the first name "Byron" being more prominent and the last name "Pickard" following in a similar script.

Byron L. Pickard