

# **EXHIBIT 15**

## DiMuzio, Elena

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**From:** DiMuzio, Elena  
**Sent:** Wednesday, December 21, 2011 12:30 PM  
**To:** Marshall M. Searcy III (marshallsearcy@quinnemanuel.com); David Perlson; Moto-Apple-SDFL  
**Cc:** Weil\_TLG Apple Moto FL External; AppleCov  
**Subject:** FW: Apple/Moto SDFL: Letter re Production of Embodying Products  
**Attachments:** 12\_14\_2011 DiMuzio to Perlson.pdf

Marshall,

As requested, here is the letter proposing a limitation to the parties' discovery requests on embodying products. I believe the proposed limitation addresses the concerns you raised about our request being over-broad and unduly burdensome. However, there are numerous decisions compelling production of information relating to all products embodying the asserted claims (as our Interrogatory 12 requests). See, for example, *Leader Techs. Inc. v. Facebook Inc.*, No. 08-862-JJF-LPS, 2009 WL 3021168 at \*2 (D. Del. Sept. 4, 2009) ("Facebook is entitled to know every Leader product or service that Leader contends practices any of the asserted claims of the patent-in-suit. Facebook is also entitled to know which claims are practiced by which of Leader's products and services."). We have found no authority to support Motorola's refusal to produce on this point.

Please let me know if you are available on Friday to continue this discussion. Thanks.

Best Regards,

Elena.

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**From:** DiMuzio, Elena  
**Sent:** Wednesday, December 14, 2011 5:20 PM  
**To:** David Perlson; Moto-Apple-SDFL  
**Cc:** Weil\_TLG Apple Moto FL External; AppleCov  
**Subject:** Apple/Moto SDFL: Letter re Production of Embodying Products

David,

Please see attached letter.

Best Regards,  
Elena.

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