
From: George Summerfield [mailto:summerfield@stadheimgear.com]
Sent: Thursday, December 29, 2011 4:07 PM
To: Franks, Tim (Perkins Coie); bferrall@kvn.com; PMaholtra@kvn.com
Cc: Rolf Stadheim; Joe Grear; Keith Vogt; Steve Pedersen
Subject: STC v. Intel - Draft Motion to Strike

All -

Recent caselaw suggests that a defendant can no longer plead a laundry list of affirmative defenses/counterclaims with no specificity attendant thereto. Attached is a draft motion directed to those defenses and counterclaims asserted by Intel that run afoul of this prohibition. We would like to avoid bothering the Court with this motion, if possible. We also see this is a good opportunity for eliminating the defenses and counterclaims that Intel does not intend to pursue seriously. To that end, please let us know by January 3rd whether Intel will re-file its latest amended answer and counterclaims to provide the requisite specificity to the defenses and counterclaims that it intends to pursue, and to remove those defenses and counterclaims for which Intel cannot provide the requisite specificity.

If we have not heard from you by close of business on January 3, we will assume that you will not be amending your answer and counterclaim, and will file the attached motion.

Regards,

George

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EXHIBIT I

1/17/2012

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