

EXHIBIT R

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

OPTIMUM POWER SOLUTIONS LLC	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 6:10-CV-61-LED
	§	
v.	§	
	§	JURY TRIAL DEMANDED
APPLE INC., ET AL.,	§	
	§	
Defendants.	§	

DEFENDANT APPLE INC.'S INITIAL DISCLOSURES

Defendant Apple Inc. ("Apple") provides the following initial disclosures. These disclosures are made based on information now reasonably available to Apple, and Apple anticipates that discovery and other pretrial preparation may develop further information. Accordingly, Apple reserves the right to clarify, amend, modify, and supplement the information contained in these disclosures as permitted by the Federal Rules of Civil Procedure.

Apple does not represent that these disclosures identify every document, tangible thing, or witness relevant to the claims and/or defenses of any party to this action. Apple intends to make additional disclosures of such information at the times specified by the Court's Discovery Order and the Local Patent Rules. Apple reserves the right to call any witness or present any exhibit or item at trial not listed here, but identified through discovery or investigation during this action. Moreover, Apple does not waive its right to object to the production of any document or tangible thing based on the attorney-client privilege, the work-product doctrine, relevancy, undue burden, or any other applicable privilege or objection.

A. CORRECT NAMES OF THE PARTIES TO THE LAWSUIT

Apple confirms that its correct name is Apple Inc.

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

OPTIMUM POWER SOLUTIONS LLC,

Plaintiff,

v.

Case No. 6:10cv61-LED

APPLE, INC., et al.,

Defendants.

DELL INC.'S INITIAL DISCLOSURES

Defendant Dell Inc. provides these initial disclosures in compliance with the Federal Rules of Civil Procedure, the Local Rules of the Eastern District of Texas, and the parties' agreement memorialized in the Plaintiff's Unopposed Motion for Extension of Time to Respond to Defendant's Motion to Transfer Venue entered on August 19, 2010 (DKT# 50) and subsequently granted on August 25, 2010 (DKT# 51). These initial disclosures are based on information reasonably available to Dell at this time. Dell reserves the right to amend or supplement these disclosures based upon its continuing investigations and ongoing discovery.

Dell's disclosures are made without in any way waiving: (1) the right to object to such information on the grounds of competency, privilege, the work product doctrine, undue burden, relevancy and materiality, hearsay, and any other proper ground; (2) the right to object to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (3) the right to object on any and all grounds, at any time, to any discovery request or proceeding involving or relating to the subject matter of these disclosures.

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

OPTIMUM POWER SOLUTIONS LLC, a
Texas Limited Liability Company,

Plaintiff,

vs.

APPLE INC., a California corporation, DELL
INC., a Delaware corporation, HEWLETT-
PACKARD COMPANY, a California
corporation, LENOVO (UNITED STATES)
INC., a Delaware corporation, and SONY
ELECTRONICS, INC., a Delaware
corporation,

Defendants.

Civil No. 6:10-CV-00061-LED

Before: Leonard E. Davis

DEFENDANT HEWLETT-PACKARD COMPANY'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, and the Court's Orders of July 29, 2010 and August 25, 2010, Defendant Hewlett-Packard Company ("HP") hereby provides the following Initial Disclosures. Pursuant to Rule 26(e) of Federal Rules of Civil Procedure, HP reserves the right to modify or supplement the information produced in these Initial Disclosures. HP further reserves the right to use and introduce such supplemental information or any subsequently identified or produced testimony, information, or documents at the trial of this action.

HP does not waive any evidentiary objections to the information disclosed herein nor any applicable privileges or protections from discovery. HP's disclosures are also made without waiving in any way: (1) the right to object on the grounds of competency, privilege, relevancy, and materiality, hearsay, or any other proper ground, to the use of such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (2) the right to

EXHIBIT F

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

OPTIMUM POWER SOLUTIONS LLC,	§	
	§	
Plaintiff,	§	
v.	§	
	§	Civil Action No. 6:10-cv-61 (LED)
APPLE INC., DELL INC., HEWLETT	§	
PACKARD COMPANY, LENOVO	§	
(UNITED STATES) INC., and SONY	§	Jury Trial Demanded
ELECTRONICS, INC.,	§	
	§	
Defendants.	§	

DEFENDANT LENOVO (UNITED STATES) INC.'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the Court's Discovery Order, Defendant Lenovo (United States) Inc. (hereafter "Lenovo") respectfully submits the following initial disclosures of information. These disclosures are based upon the information reasonably available to Lenovo at this time. Lenovo's investigation is on-going. As discovery progresses, Lenovo reserves the right to revise, clarify, or supplement these disclosures pursuant to Rule 26(e)(1) of the Federal Rules of Civil Procedure or any other applicable rule. Information or materials protected by the attorney-client privilege and/or work product doctrine will not be disclosed as part of these initial disclosures. Lenovo reserves the right to object to the production and/or introduction of evidence of these disclosures and/or any document within the categories described below as well as to any testimony by any of the disclosed witnesses on the basis of competency, privilege, relevancy, materiality, hearsay, undue burden, or any other proper ground.

EXHIBIT G

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

OPTIMUM POWER SOLUTIONS LLC,

Plaintiff;

v.

APPLE INC., DELL INC., HEWLETT
PACKARD COMPANY, LENOVO
(UNITED STATES) INC., and SONY
ELECTRONICS INC.,

Defendants.

Case No. 6:10CV61 LED

**INITIAL DISCLOSURES OF SONY ELECTRONICS INC.
PURSUANT TO FED. R. CIV. P. 26(a)(1) AND DISCOVERY ORDER**

Pursuant to FED. R. CIV. P. 26(a)(1) Defendants Sony Electronics Inc. (“SEL”), by and through its undersigned counsel, hereby submit the following Initial Disclosures. These disclosures are based upon information reasonably available to the SEL at this time. SEL reserves the right to amend or supplement these disclosures as necessary during the course of discovery. By making these disclosures, SEL does not waive any applicable privilege, work product protection, or other objection, and reserve its rights to object to the production or admissibility of any information included in the categories below. SEL hereby incorporates by reference the Initial Disclosures of Apple Inc., Dell Inc.; Hewlett Packard Company, and Lenovo (United States) Inc.

A. CORRECT NAMES OF THE PARTIES TO THE LAWSUIT

The correct name of defendant SEL is Sony Electronics Inc.