

EXHIBIT B

From: Stein, Kenneth L. [kstein@stroock.com]
Sent: Sunday, May 16, 2010 6:54 PM
To: Soobert, Allan M.
Cc: Mirror Worlds; MW_v_Apple
Subject: Mirror Worlds v. Apple: Amended PICs

Allan,

I would like to clarify the parties' agreement regarding amending the preliminary infringement and invalidity contentions.

The issue of amending the PICs originally arose when Apple included in its amended preliminary invalidity contentions, dated May 11, 2009, two new references without advising Mirror Worlds beforehand—(1) Gifford, *et al.*, "Semantic File Systems" and (2) On Location 2.0.1. When we advised Apple's counsel of this, Apple asked Mirror Worlds to agree to not oppose Apple's further amendment of the PICs, as set forth in Apple's May 11, 2009 amended contentions. Mirror Worlds agreed to that in connection with scheduling discussion towards the end of last year.

Subsequent to that, Nick Brown of Weil Gotshal may have mentioned during a telephone conference that Apple was considering adding an additional reference to its invalidity contentions. It does not appear, however, that he identified that reference. If Apple is still considering adding that reference to its invalidity contentions, please identify it. Mirror Worlds reserves all rights with respect to that reference.

With respect to Mirror Worlds' preliminary infringement contentions, Apple has released new products since this lawsuit was filed (such as Snow Leopard and Safari), which Mirror Worlds' contends also infringe the patents-in-suit. While Mirror Worlds' original contentions are already broad enough to cover those products, we intend to specifically name them in the amended preliminary infringement contentions.

There also remains the issue of filing a motion with the Court to amend the case schedule to permit a further exchange of PICs.

If your understanding differs from that set forth above, we should set up a time to talk tomorrow.

Regards,

Ken

IRS Circular 230

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