

# Exhibit A

# McKool Smith

A PROFESSIONAL CORPORATION • ATTORNEYS

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December 15, 2010

**VIA E-MAIL:**

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Re: *Eolas Technologies Incorporated v. Adobe Systems, Inc., et. al*; Civil Action No. 6:09-CV-00446-LED; United District Court of Texas; Eastern District

Counsel:

By our count, Texas Instruments (“TI”) has produced *no documents whatsoever* nor has TI made *any* source code for its accused products available for inspection. Given the scope of Eolas’ infringement allegations against TI—including allegations against many of TI’s web pages—we find this production to be woefully deficient.

The document and source code production deadlines set by the Discovery Order—even as extended—passed months ago. Accordingly, we request a date certain when TI will complete its production of documents, source code and other things related to this case. Any further delay is not only in continued violation of the Court’s orders, it is severely prejudicial to Eolas.

Similarly, TI has not responded to Eolas’ written discovery. For example, we are unable to locate any response from TI to Eolas’ Second Set of Interrogatories (Nos. 6-8) to be Separately Answered by Each Defendant. We are also unable to locate any response from TI to Eolas’ Third Set of Interrogatories to be Answered by Each Defendant (No. 9). TI’s responses to these Interrogatories were due on October 21, 2010 and December 6, 2010, respectively.

We request a written response to this correspondence by close of business on Friday. Should we not hear from you by then, or should you not provide a date certain before the end of the year for the completion of your document production and interrogatory supplementation, please be prepared for an immediate meet and confer so that we may seek formal relief from the Court.

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Sincerely,



Josh Budwin

cc:

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