

Exhibit I



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FOUNDED 1866

December 1, 2010

By Email

Matt Rappaport
McKool Smith P.C.
300 West 6th Street
Suite 1700
Austin, Texas 87801

Re: *Eolas Technologies Inc. v. Adobe Systems, Inc., et al.*, No. 6:09-cv-446 (E.D. Tex.)

Dear Matt:

This responds to your November 3, 2010 letter regarding Apple's source code production in the above-captioned matter. For clarity, the numbering below is intended to correspond to the numbering used in your letter. In addition, this responds to your November 5, 2010 e-mail seeking the production of source code for what you referred to as the "YouTube app." In some instances, Apple's investigation remains ongoing, but we wanted to respond to Eolas's inquiries.

1. Website: As you know, the parties have been conferring about the possibility of some kind of "representative" source code arrangement for website source code and Eolas agreed to defer inspection of website source code. Apple has considered its options and has determined to do the following. Apple will make available for inspection all www.apple.com source code that Apple has been able to locate for time periods prior to June 2007. For the time periods subsequent to June 2007, Apple will be making available for inspection a monthly source code "snapshot" of www.apple.com, with each monthly snapshot being representative of www.apple.com for that month's time period. With respect to http://developer.apple.com, no source code has been archived for time periods prior to approximately January 2008. For approximately January 2008 forward, Apple will make available for inspection a monthly source code "snapshot" of http://developer.apple.com, with each monthly snapshot being representative of http://developer.apple.com for that month's time period. With respect to your request for "client- and server-side code," the source code made available will be what Apple understands to be server-side. We do not understand what Eolas means by "client-side" website source code.

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2. Safari: Apple will make available for inspection all major versions (*e.g.*, 1.0, 2.0, etc.) of Safari for all platforms. The source code for each major version will be representative of the source code for any minor versions of such major version (*e.g.*, version 1.0 would be representative of version 1.1).

3. iTunes Store: Eolas seeks to inspect the source code for "iTunes files provided by the iTunes Store servers" including various .jsz files specifically identified. Apple is agreeable to making available for inspection the specific .jsz files identified. Beyond that, we do not understand what Eolas is requesting.

4. QuickTime: Apple will make available for inspection the following versions of QuickTime for Mac OS X versions 6.4, 6.5, 7.0.1, 7.1, 7.2, 7.3, 7.4, 7.5, and X and QuickTime for Windows versions 6.4, 6.5, 7.0.1, 7.1, 7.2, 7.3, 7.4, 7.5, and 7.6. Each version of QuickTime includes, *inter alia*, QuickTime Pro, QuickTime Broadcaster, QuickTime Player, and QuickTime Plug-in. The source code for each version produced will be representative of the source code for any updated versions of that version (*e.g.*, version 6.5 would be representative of 6.5.1). Apple is also agreeable to producing for inspection source code for any previously unproduced major versions of QuickTime Streaming Server, Darwin Streaming Server, and QuickTime VR Authoring Studio distributed during the damages period that Apple can locate after a reasonable search. Apple's search remains ongoing and Apple is not yet able to confirm which versions, other than the versions previously produced, are still available, if any.

5. Apple Search Shortcuts: Apple Search Shortcuts related source code will be made available for inspection as part of the website code production discussed above. Again, with respect to your request for "client- and server-side code," the source code made available will be what Apple understands to be server-side. We do not understand what Eolas means by "client-side" website source code in this context. If there is something more that Eolas is seeking, please clarify.

6. iAd: Apple disagrees that "Eolas has accused the iAd functionality." The iAd application has never been disclosed as an "Accused Instrumentality" pursuant to P.R. 3-1(b). To the extent Eolas included offhand references to iAd in its July 23, 2010 supplemental infringement contentions, those claim charts were addressed to Safari for the iPhone. Indeed, the Court's June 23, 2010 Order only gave Eolas leave to serve supplemental contentions regarding Safari, and so even if Eolas had disclosed the iAd application as an "Accused Instrumentality" in its supplemental contentions, such a disclosure would have been without leave, untimely, and improper. Accordingly, production of iAd source code is not required.

"YouTube App": Apple's investigation into the issue of source code for the "YouTube app" in response to your recent e-mail remains ongoing. Apple expects to respond shortly.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Teague I. Donahey". The signature is written in a cursive style with a large, sweeping initial "T".

Teague I. Donahey

TID:lcd