IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TESSERA, INC. and TESSERA ADVANCED TECHNOLOGIES, INC.,	
Plaintiffs,	
v.	C.A. No. 16-380-LPS-CJB
BROADCOM CORPORATION,	**REDACTED - PUBLIC VERSION**
Defendant.	

LETTER TO THE HONORABLE CHRISTOPHER J. BURKE FROM PILAR G. KRAMAN PURSUANT TO THE COURT'S ORAL ORDER OF JUNE 26, 2017

Of Counsel:
KILPATRICK TOWNSEND & STOCKTON LLP
David E. Sipiora
dsipiora@kilpatricktownsend.com
Suite 600, 1400 Wewatta Street
Denver, Colorado 80202

Robert J. Artuz
rartuz@kilpatricktownsend.com
Kevin J. O'Brien
kobrien@kilpatricktownsend.com
Two Embarcadero Center, Suite 1900
San Francisco, California 94111

Jonathan D. Olinger
jolinger@kilpatricktownsend.com
Suite 2800, 1100 Peachtree Street NE
Atlanta, Georgia 30309-4528

FOLEY & LARDNER LLP
Ramy E. Hanna
rhanna@foley.com (No. 5494)
Steven J. Rizzi
srizzi@foley.com
90 Park Avenue
New York, NY 10016-1314

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Adam W. Poff (No. 3990)
Pilar G. Kraman (No. 5199)
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
apoff@ycst.com
pkraman@ycst.com

Attorneys for Defendant
BROADCOM CORPORATION

Dated: July 14, 2017
Redacted Version: July 20, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP
Attorneys at Law

WILMINGTON
RODNEY SQUARE

NEW YORK
ROCKEFELLER CENTER

Pilar G. Kraman
P 302.576.3586
F 302.576.3742
pkraman@ycst.com

July 14, 2017

REDACTED VERSION

VIA CM/ECF & HAND DELIVERY
The Honorable Christopher J. Burke
United States District Court
for the District of Delaware
844 North King Street
Wilmington, Delaware 19801

Re: *Tessera, Inc., et al. v. Broadcom Corporation*
Case No. 1:16-cv-00380-LPS-CJB

Dear Judge Burke:

Pursuant to the Court's Oral Order dated June 26, 2017, Defendant Broadcom Corporation ("Broadcom") provides the following information and proposal regarding the products identified in Paragraph 6 of the Court's Memorandum Order (D.I. 133 at 6):

1. Broadcom confirms that [redacted]. Broadcom has produced the relevant circuit schematics to Plaintiffs.

2. Broadcom stipulates that [redacted]. In light of this stipulation, Broadcom proposes that there is no need to produce circuit schematics for these products.

3. Broadcom proposes to complete its analysis of the remaining two products, [redacted] and [redacted] no later than August 15, 2017.

Respectfully submitted,

Pilar G. Kraman (No. 5199)

cc: Counsel of record (via CM/ECF and email)
Clerk of the Court (by hand delivery)