

# EXHIBIT B

[REDACTED]

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[REDACTED]

[REDACTED]

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**From:** Borgman, Steve  
**Sent:** Wednesday, February 01, 2012 3:58 PM  
**To:** 'Melissa Dalziel'  
**Subject:** RE: Apple v. Samsung (NDCA Action)

Melissa -- Thank you for your January 31 email. RIM does not object to the production of the single license agreement (attached) so long as it is designated Highly Confidential -- Attorneys' Eyes Only under the protective order dated January 30, 2012 (Dkt. 687), and Apple employees and in-house counsel will not have access to it. Please be sure that the copy produced includes this designation on every page; the attached copy does not include this required designation yet.

Please let me know if you have any questions.

Best,

Steve

Steve Borgman  
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713-615-5758 (fax)  
[sborgman@velaw.com](mailto:sborgman@velaw.com)

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**From:** Melissa Dalziel [mailto:[melissadalziel@quinnemanuel.com](mailto:melissadalziel@quinnemanuel.com)]  
**Sent:** Tuesday, January 31, 2012 7:03 PM  
**To:** Borgman, Steve  
**Subject:** RE: Apple v. Samsung (NDCA Action)

Thanks, Steve. Attached is the new protective order in the NDCA action. The only RIM document that we have identified as responsive in the NDCA action to date is the attached patent license agreement, which has already been produced in the ITC action. The Court has ordered that this document be produced by February 3<sup>rd</sup>. (See pp. 9-11 of the attached 1/27/12 Order re: production of license agreements; p. 2 re: February 3rd production date.) Please let me know if RIM has any concerns regarding this production.

Best regards, Melissa

**Melissa Dalziel**

*Of Counsel*

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**From:** Borgman, Steve [<mailto:SBorgman@velaw.com>]

**Sent:** Tuesday, January 31, 2012 2:47 PM

**To:** Melissa Dalziel

**Subject:** RE: Apple v. Samsung (NDCA Action)

Melissa -- This is to follow up on our call last week. As I indicated on the call, RIM wants to see the specific documents involved so it knows what disclosures are involved in connection with the requested consent. In addition, I understood from the call that you were looking into the status of the stipulation and whether and to what extent it applied to non-expedited discovery, as well as whether any other protective orders have been entered in the case.

Please note that, pending resolution of these issues, RIM does not consent to the production of any RIM confidential information.

Best,

Steve

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**From:** Melissa Dalziel [<mailto:melissadalziel@quinnemanuel.com>]

**Sent:** Wednesday, January 25, 2012 5:53 PM

**To:** Borgman, Steve

**Subject:** Apple v. Samsung (NDCA Action)

Steve, I understand that you may represent RIM. Attached is a courtesy copy of correspondence we are sending to RIM via fed-ex today. Please feel free to contact me with any questions.

Best regards, Melissa

**Melissa Dalziel**

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Thank You.

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