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*NOT ADMITTED TO THE NEW YORK BAR

July 22, 2020

Via Email and ECFSteven M. Cowley
Duane Morris LLP
100 High Street, Suite 2400
Boston, MA 02110-1724Re: *Hunter Communications, Inc., et al. v. Panasonic Avionics Corporation,*
No. 7:20-cv-03434

Dear Counsel:

As you know, this firm represents Panasonic Avionics Corporation ("PAC") in connection with the above-referenced litigation. We are writing in response to your July 17, 2020 letter setting forth the purported bases for Plaintiffs' "anticipated and interrelated motions" to dismiss PAC's counterclaims under Rule 12(b)(6) and to strike PAC's second, third, seventh, eighth, ninth, tenth and eleventh affirmative defenses under Rule 12(f).

PAC does not agree with Plaintiffs that its pleading is in any way deficient or that amendment is necessary. Without conceding any arguments or waiving any rights, PAC will

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amend its answer to address the arguments advanced in Plaintiffs' letter. Consistent with Judge Karas's Individual Rule II.A., PAC will file an amended pleading within 30 days.

Sincerely,

s/ Michael E. Gertzman

Michael E. Gertzman

cc: Hon. Kenneth M. Karas, via ECF