

EXHIBIT 1

quinn emanuel trial lawyers | silicon valley

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June 27, 2011

VIA E-MAIL

Kenneth H. Bridges, Esq.
Partner
Bridges & Mavrakakis
3000 El Camino Real
One Palo Alto Square, 2nd Floor
Palo Alto, CA 94306

Re: Apple, Inc. v. Samsung Electronics Co. Ltd., Samsung Electronics America, Inc.,
Samsung Telecommunications America, LLC, Case No. 11-cv-1846-LHK (N.D. Cal.)

Dear Mr. Bridges:

I write to request information regarding your appearance as counsel for Apple in this matter on June 16, 2011. It has come to our attention that you and other attorneys at Bridges & Mavrakakis, previously represented Samsung in multiple prior matters. In fact, you tout these prior representations on your firm website, such as the *Samsung v. Ericsson* litigations.

Based solely on billing records submitted by you and the other Bridges & Mavrakakis attorneys, one or more of these prior representations are clearly substantially related to the above referenced matter. For example, the *Ericsson* case dealt with Samsung technology relating to mobile devices, which is at the heart of Apple's current lawsuit. Through this prior representation, you gained access to Samsung's confidential information on a wide range of topics that are relevant to this current litigation.

As you are aware, an attorney may not "without the informed written consent of the client or former client, accept employment adverse to the client or former client where, by reason of the representation of the client or former client, the member has obtained confidential information

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material to the employment.” Cal. Rules of Prof'l Conduct 3-310(E). Here, neither you, nor any other attorneys at Bridges & Mavrakakis have received Samsung's consent to represent Apple in this matter. Because the subject matter of the previous litigations and this litigation are substantially related, your access to confidential information is presumed and this knowledge is imputed to your entire firm. Flatt v. Superior Court, 9 Cal. 4th 275, 283 (1994). Your successive representations of Samsung and Apple are a matter of great concern to Samsung.

In light of these serious issues, we request a meet and confer, no later than June 29th to discuss the following issues:

- Information regarding your, and any other attorneys' at Bridges & Mavrakakis, involvement with any past representations of Samsung.
- Whether any Samsung confidential information gained during these representations has been shared with Apple, Morrison & Foerster, or Wilmer Hale.
- If you contend that these past representations are not substantially related, all bases for this contention.
- Bridges & Mavrakakis' role in the current litigation, including for example, amount of time billed, subject matter of time spent, etc.
- Apple's knowledge of these prior representations.

We appreciate your prompt cooperation on this matter. While we would prefer to resolve this matter without the need for judicial intervention, Samsung expressly reserves all of its rights therein.

Very truly yours,

 /AOT

Victoria F. Maroulis

VFM

cc: Mr. Jason Bartlett, Morrison & Foerster