

EXHIBIT A

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May 25, 2012

VIA ELECTRONIC MAIL

Mia Mazza, Esq.
Morrison & Foerster LLP
425 Market Street
San Francisco, CA 94105-2482

Re: *Apple v. Samsung Elecs. Co. et al.*, Case No. 11-cv-1846 LHK (N.D. Cal.)

Dear Mia,

I write again regarding Apple's continued non-compliance with the Court's April 12, 2012 Order regarding production of materials from related proceedings.

1. In your April 30 letter, you stated that Apple had notified and requested consent from "all" "third parties whose consent would need to be obtained in order for all remaining documents to be released." On May 7, however, Apple's Status Update stated that counsel for Apple in the *Elan v. Apple* action in the Northern District of California "is reviewing to confirm no additional consents are required prior to production." Please let us know whether counsel for Apple has now finished its review, and whether it determined that consents were needed from any third parties not previously identified. If additional third parties were identified, please identify them by name, let us know whether and when they received a notification and request for consent, and furnish us with a copy of any related correspondence.
2. Please let us know what Apple has done since April 30 to secure consent from each of the third parties whose CBI has been implicated, and provide us with copies of all related correspondence. For each of the third parties, also please specifically identify whose lack of consent Apple believes still remains a "barrier to production," and provide a brief

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description of whatever issue is proving to be an impediment, and specifically what Apple has done to address it.

3. Please identify by Bates number all documents from proceedings with a technological nexus that Apple has produced since it filed its May 7 Status Update Regarding Compliance With April 12 Order.
4. In your May 4 letter, you stated that "[w]ith respect to the *Elan ITC* matter, the docket sheet reflects what is being withheld—all documents that were filed confidentially as opposed to publicly." Please explain why Apple is withholding "all documents that were filed confidentially" as opposed to only documents that contain Elan CBI. Please quantify and specifically identify the materials from the Elan ITC case still being withheld.
5. Please produce all remaining documents responsive to Section B.2. of the April 12 order in redacted form without further delay.
6. Please produce immediately any employee deposition transcripts from the ten cases with a technological nexus that have not already been produced and explain why they were withheld. Note also that Apple has a continuing obligation to produce new responsive transcripts. It appears Apple only produced transcripts from depositions taken before or on March 27, 2012.

I look forward to hearing from you.

Kind regards,

/s/ Diane C. Hutnyan

Diane C. Hutnyan

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