

**DECLARATION OF NATHAN SABRI IN
SUPPORT OF APPLE'S OPPOSITIONS TO
SAMSUNG'S MOTION FOR SANCTIONS AND
MOTION TO ENFORCE**

EXHIBIT 24

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VIA ELECTRONIC MAIL

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

Dear Mia,

Thank you for your letter of May 24th.

The general concept here is that Apple's experts should be prevented from presenting, either affirmatively or in response to our use of the transcripts, explanations, denials or other responses, when Samsung was precluded from obtaining that information during discovery due to Apple's undisputed withholding of the transcripts. So the issue is not really about finding a particular reference in a past report; it's that all such references, whether they have been made or are yet to be made, are improper.

Further, if Apple believes none of its experts have furnished any "expert report or testimony in this case that refers to, responds to, denies, relies upon, or is contrary to any testimony contained in the transcripts Apple produced pursuant to the April 12 Order," then it sounds like Apple should not be opposing the relief requested in subsection (3). Please confirm that that is the case.

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I also note that you misquoted Samsung's requested relief. Please refer to the motion to understand the scope of what is at issue here.

Kind regards,

/s/ Diane C. Hutnyan

Diane C. Hutnyan