

# Exhibit B

**EXHIBIT 7**  
**FILED UNDER SEAL**

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November 1, 2011

WRITER'S INTERNET ADDRESS  
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**VIA E-MAIL**

Jason Bartlett  
Morrison & Foerster LLP  
425 Market St.  
San Francisco, CA 94105-2482

Re: *Apple v. Samsung Electronics, et al.*, No. 5:11-cv-01846-LHK (N.D. Cal.)

Dear Jason:

As you are aware, we have noted repeatedly the deficient nature of Apple's productions relating to its design patent inventors. The depositions of Apple's designers have only served to highlight the extent of Apple's production deficiencies.

[REDACTED]

[REDACTED]

**quinn emanuel urquhart & sullivan, llp**

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1989 “Brain Box”

Finally, it has come to Samsung’s attention that Apple may have in its possession additional potential prior art relating to the ‘889 design patent in the form of a product or prototype referred to as the “Brain Box” – a flat panel display and keyboard designed in 1989 by Apple designers, including Gavin Ivester, Tony Guido and Sigmar Wilnauer. Samsung requests that Apple produce or make available for inspection all documents and things, including all models and

Jason Bartlett  
November 1, 2011  
Page 3

prototypes, related to the Brain Box. These materials are responsive to (at least) Samsung's Request for Production No. 98.

In light of these and other production deficiencies, Samsung reserves the right to pursue motion practice and to re-call all deponents impacted by Apple's production failures for an additional day of deposition.

Sincerely,

*/s/ Michael T. Zeller*

Michael T. Zeller