

EXHIBIT C

June 11, 2012

Writer's Direct Contact
415.268.6024
MMazza@mofo.com

By Email (dianehutnyan@quinnemanuel.com)

Diane C. Hutnyan
Quinn Emanuel
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017

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

Dear Diane:

This letter is to provide you with an update regarding the court documents from other cases that Apple has been unable to produce in unredacted form pursuant to the April 12, 2012 Order.

Apple v. HTC (D. Del.)

Apple has produced unredacted versions of all court documents with the exception of four documents containing Google CBI. We are informed by counsel for Apple in the *HTC* Delaware matter that Google has not provided consent for the production of unredacted versions of these four documents. Redacted versions of the documents have been produced at APLNDC-Y0000252836, APLNDC-Y0000252859, APLNDC-Y0000252954, and APLNDC-Y0000252971.

Elan v. Apple (N.D. Cal.)

Apple has now produced unredacted versions of all court documents.

Elan v. Apple (ITC 714)

Apple has produced unredacted versions of all court documents from the *Elan* ITC matter with the exception of the confidential documents that contain Elan CBI. We are informed by counsel for Apple in the *Elan* ITC matter that Elan has refused to provide consent for the production of unredacted versions of these documents. We are further informed that counsel for Apple has given Elan until June 12 to object to or correct proposed redactions to those documents. We expect that Apple will have produced redacted versions of the documents by June 14.

Diane C. Hutnyan
 June 11, 2012
 Page Two

Apple v. Motorola (N.D. Ill. and ITC 750)

Apple has produced unredacted versions of all court documents with the exception of documents containing CBI of nine nonparties who have either not provided consent or refused to consent. Nokia Siemens Networks has withheld consent. Thomas Cronan/Taligent, Synaptics, Microsoft, New York University, Qualcomm, Texas Instruments did not respond to two separate letters providing notice and requesting consent. We have been informed that counsel for Apple in the *Motorola* matters did not have contact information to request permission from Broadcom or BCN to release their CBI as those materials were submitted by Motorola.

The *Motorola* documents that have not been produced in unredacted form fall into two categories. Approximately 100 have been produced in redacted form, at APLNDC-Y0000384065 through APLNDC-Y0000394590. We are informed by counsel for Apple in the *Motorola* matters that the third party whose CBI is involved in each document is plain from the face of the document.

The remaining fifteen documents could not be produced in redacted form because they are completely CBI:

Docket Number	Document Title	Third Party Involved
ITC-750		
750-013	Exhibit 15 to Complainant Apple Inc.'s Opposition to Respondents' Motion to Terminate Investigation with Respect to U.S. Patent No. 5,379,430 (Cronan Deposition Transcript)	Cronan/Taligent CBI
NDIL		
216	Declaration of George Kondylis filed by Plaintiff Apple, Inc. re: 213 Motion for Summary Judgment	Broadcom CBI
224	Declaration of Jochen Vaihinger filed by Plaintiff Apple, Inc. re: 213 Motion for Summary Judgment	Intel CBI
229-2	Exhibit 2 to Declaration of David M. Elihu filed by Defendants Motorola Mobility, Inc., Motorola, Inc. re: 215 Motion to Dismiss/Lack of Jurisdiction (Excerpts of Thomas Cronin deposition transcript)	Cronan/Taligent CBI

Diane C. Hutnyan
 June 11, 2012
 Page Three

Docket Number	Document Title	Third Party Involved
450-1	Exhibit 2 <i>TO APPENDIX TO MOTOROLA'S MEMORANDUM IN OPPOSITION TO APPLES MOTION FOR SUMMARY JUDGMENT OF U.S. PATENT NO. 5,311,516</i> (Declaration of George Kondylis)	Broadcom CBI
450-3	Exhibit 4 <i>TO APPENDIX TO MOTOROLA'S MEMORANDUM IN OPPOSITION TO APPLES MOTION FOR SUMMARY JUDGMENT OF U.S. PATENT NO. 5,311,516</i> (Excerpts from Kondylis deposition transcript)	Broadcom CBI
458-2	Exhibit 2 from <i>SEALED EXHIBITS TO APPENDIX TO MOTOROLA MOBILITY, INC. AND MOTOROLA SOLUTIONS, INC.'S MOTION TO DISMISS PURSUANT TO FED. R. CIV. P. 12(b)(1)</i> (Excerpts from Cronan deposition transcript)	Cronan/Taligent CBI
462-8 to 462-14	Parts 1-7 of Exhibit 17 from <i>SEALED EXHIBITS TO APPENDIX TO MOTOROLA'S MEMORANDUM IN OPPOSITION TO APPLES MOTION FOR SUMMARY JUDGMENT OF U.S. PATENT NO. 6,175,559</i>	Texas Instruments CBI
462-15	Exhibit 18 from <i>SEALED EXHIBITS TO APPENDIX TO MOTOROLA'S MEMORANDUM IN OPPOSITION TO APPLES MOTION FOR SUMMARY JUDGMENT OF U.S. PATENT NO. 6,175,559</i>	Boston Computing Network CBI

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: S. Calvin Walden
 Peter Kolovos