

EXHIBIT E

April 22, 2012

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By Email (dianehutnyan@quinnemanuel.com)

Diane Hutnyan
Quinn Emanuel
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017

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

Dear Diane:

This letter is regarding Apple's compliance with Part B.2 of the Court's April 12, 2012, Order. We have provided separate communication regarding Part B.1, and we will provide separate communication regarding Part A.

Apple is gathering, processing, and producing on a rolling basis all nonconfidential court documents from the eight cases identified by Samsung in its moving papers, as follows:

- *Certain Portable Electronic Devices and Related Software (Apple v. HTC)*, ITC Inv. No. 337-TA-797
- *Apple v. HTC, et al.*, CA. No. 10-167-GMS (D. Del.)
- *Certain Electronic Devices with Multi-Touch Enabled Touchpad and Touchscreens (Elan Microelectronics Corp. v. Apple)*, ITC Inv. No. 337-TA-714
- *Elan Microelectronics Corp. v. Apple, Inc.*, 09-cv-01531 (N.D. Cal.)
- *Nokia v. Apple*, 09-cv-00791 (D. Del.)
- *Certain Mobile Devices And Related Software (Apple v. Motorola)*, ITC Inv. No. 337-TA-750
- *Apple Inc. v. Motorola Inc. et al.*, 10-cv-00661 (W.D. Wis.)
- *Apple Inc. v. Motorola Inc. et al.*, 11-cv-08540 (D. Ill.) (formerly *Apple Inc. v. Motorola Inc. et al.*, 10-cv-00662 (W.D. Wis.))

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Regarding nonpublic materials containing the Confidential Business Information of parties other than Apple, the problem of third party Confidential Business Information remains a barrier to production despite the April 12 Order. We have reviewed the Protective Orders entered in each of those cases and investigations, and will forward them to you under separate cover. It does not appear that these orders authorize Apple to disclose other parties' (or nonparties') Confidential Business Information pursuant to an order issued in another case (or, in the case of ITC proceedings, another court). Rather, even if an order is issued directing the production of a third party's protected information, the third party must authorize the production.

The April 12 Order was based in part upon Samsung's representation that "it has secured consent from four of the five third-parties whose materials may be disclosed." As you well know, however, the Confidential Business Information of more than five third parties is included in the nonpublic court documents filed in the above eight cases. **Please immediately identify in writing every party (i.e., HTC, Nokia, Motorola, and Elan) and nonparty (e.g., Google) that has provided blanket authorization for Samsung to receive their confidential business information. Please also immediately forward to us those parties' and nonparties' written authorization.**

To facilitate moving forward on producing these nonpublic materials as quickly as possible, we enclose docket sheets for the eight matters at issue. **Please identify in writing, no later than 9 a.m. on Tuesday, April 24, each nonpublic item in each case that Samsung wishes to receive under Part B.2 of the April 12 Order.** We urge Samsung to exercise discretion and reasonableness in making these identifications.

As soon as Apple receives Samsung's selections, counsel for Apple will review the requested items to determine whether any of them contain the Confidential Business Information of any party or nonparty that has not provided written blanket authorization for Samsung to receive its CBI. Apple will advise Samsung of those parties, and Samsung may then proceed as it wishes toward obtaining their necessary authorization.

Sincerely,

/s/ Mia Mazza

Mia Mazza

Encls.

cc: S. Calvin Walden
Peter Kolovos