

# EXHIBIT A

**EXHIBIT 14**  
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**quinn emanuel trial lawyers | silicon valley**

555 Twin Dolphin Drive, 5th Floor, Redwood Shores, California 94065-2139 | TEL: (650) 801-5000 FAX: (650) 801-5100

WRITER'S DIRECT DIAL NO.  
**(213) 443-3180**

November 1, 2011

WRITER'S INTERNET ADDRESS  
**michaelzeller@quinnemanuel.com**

**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**

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100  
NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100  
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CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401  
WASHINGTON, DC | 1101 Pennsylvania Avenue NW, 6th Floor, Washington, District of Columbia 20004-2544 | TEL (202) 756-1950 FAX (202) 756-1951  
LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100  
TOKYO | NBF Hibiya Bldg., 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712

[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

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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