

EXHIBIT C

EXHIBIT 16
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December 10, 2011

Mia Mazza
Morrison & Foerster
425 Market Street
San Francisco, CA 94105-2482

S. Calvin Walden
WilmerHale
399 Park Ave
New York, NY 10022

Re: Apple, Inc. v. Samsung Elecs. Co., Case No. 11-CV-1846 LHK

Dear Mia and Calvin:

In the Court's December 9, 2011 Order re Temporary Relief From In Person Meet and Confer Requirement (Dkt. 472), the Court excused Apple from the "in-person" requirement, but Apple still needs to conduct a lead counsel meet and confer. Mr. Verhoeven is available on December 11, 2011 at 2:00 pm, Pacific Time, to meet telephonically on the issues raised by Apple's motion, as well as on the issues we've previously identified as ripe for lead-counsel meet-and-confer, including:

- Documents from Apple's action against Motorola in the ITC
- Mac OS 10.0 and SuperClock source code
- Return of Samsung's memory cards and [REDACTED] n of Apple's copies of photographs
- Documents, including model shop records and tangibles related to the 035 Mockup
- Obtaining Apple's compliance with Judge Grewal's order of November 16, 2011 requiring complete searches for materials relating to the 035 Mockup
- Supplemental response to Interrogatory 1
- [REDACTED]

quinn emanuel urquhart & sullivan, llp

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Mia Mazza
S. Calvin Walden
December 10, 2011

- [REDACTED]
- [REDACTED]
- Documents and prototypes related to the “Brain Box”
- Documents and prototypes related to the Apple Cinema Display
- Prior deposition testimony of Apple’s employees, testifying in their capacity as Apple employees
- Release of materials designated "Attorneys' Eyes Only" to Dr. Itay Sherman

Please let us know Mr. McElhinny's availability as soon as possible.

Kind regards,

/s/

Diane C. Hutnyan