

# EXHIBIT D

**EXHIBIT 17**  
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December 30, 2011

Mia Mazza  
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 Mia:

I write regarding the search terms applied to the electronic document and model databases for items relating to the Brain Box flat panel display, Apple Cinema Display, [REDACTED]. As you are well aware, the Court has ordered Apple to conduct a reasonable, good faith search for these items, and although we appreciate Apple's explanation regarding its search process for these items, Apple's search process as described in your December 24, 2011 letter is deficient. Accordingly, per your invitation, we would like to propose some additional search terms that should not be overly burdensome to run, but that are very likely to result in additional relevant hits.

Brain Box flat panel display

In your December 24 letter, you stated that Apple has run the search term "Brain Box" through the entire electronic document collection of the Industrial Design inventors, and that Apple has also run the term "Brain Box," the names of the alleged designers of the Brain Box, and the year 1989 through its database of models.

Please also run the following terms through the electronic document and email collection: "flat

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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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TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712  
MANNHEIM | Erzbergerstraße 5, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100  
MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

panel" within 20 of ("1989" or "Sigmar" or "Wilnauer" or "Gavin" or "Ivester" or "Tony" or "Anthony" or "Guido").

Apple Cinema Display

Your December 24 letter does not specify what searches have been or are being conducted to locate materials related to the Apple Cinema Display. Please confirm that you have searched the term "Apple Cinema Display" in the electronic document and email collection as well as in the model database. Further, if you have not already done so, please also run the search terms "ACD" and "cinema" on the electronic document and email collection as well as the model database.

[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

Please confirm in writing by January 2, 2012 that we have the correct understanding of your search terms and process, and that you will apply Samsung's proposed terms and produce by January 15, 2012 all additional items and documents that these proposed terms hit.

Kind regards,

/s/

Diane C. Hutnyan