

**EXHIBIT 16**  
**FILED UNDER SEAL**

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 deletion 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
- Complete design inventor sketchbooks (redacting only future products)

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- Materials related to Apple's investigation of Sony design language and designs based on other smartphones (Treo/Razr)
- Materials related to "Phillips receiver" test reports in connection with development of iPhone
- 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