

EXHIBIT 17
FILED UNDER SEAL

quinn emanuel trial lawyers | los angeles

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL: (213) 443-3000 FAX: (213) 443-3100

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, Sony and other smartphone investigations, and Phillips Receiver test reports. 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

quinn emanuel urquhart & sullivan, llp

NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700

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

CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401

WASHINGTON, DC | 1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004-2400 | TEL (202) 538-8000 FAX (202) 538-8100

LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

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.

Sony design investigation

You state in your letter that you have applied the term "Sony" to Apple's entire collection of emails and other electronic documents, as well as to the model database.

Please also run the following terms through the electronic document and email collection: "Jony" within 50 of ("design investigation" or "design language" or "*phone*").

Our use of an asterisk ("*") around the word "phone" indicates that this term should be open ended (*e.g.*, "*phone*" would include "smartphone," "smartphones," "phones," etc.)

Treo/Razr investigations

You also indicate in your letter that you have run the terms "Treo" and "Razr" through Apple's entire collection of emails and other electronic documents, as well as the model database.

Please also run the following terms through the electronic document and email collection, as well as the model database: ("Motorola" or "Palm") within 20 of ("design investigation" or "design language" or "*phone*").

Phillips receiver test reports

Finally, your letter states that you have run the terms "Philips" and "Phillips" through Apple's entire collection of emails and other electronic documents.

Please also run the following terms through the electronic document and email collection: ("Philip" or "Phillip") within 10 of "receiver".

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