

# EXHIBIT 13

November 8, 2011

**VIA ELECTRONIC MAIL**

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

Re: *Apple v. Samsung Elecs. Co. et al.*, Case No. 11-cv-1846 LHK (N.D. Cal.)

Dear Mia:

It has come to Samsung's attention that Apple generated designs based on Sony's design language and created actual, three-dimensional models of these designs. *See* October 27, 2011 Deposition of Eugene Whang at 88:10-92:19; documents bearing production numbers APLNDC-NCC00000200-217; APLNDC0000038109-38166; APLNDC0000038016-38040; October 31, 2011 Deposition of Richard Howarth at 17:23-26:25. Please produce the documents related to the Sony design exercise/investigation, including but not limited to the notebooks, diagrams, progress reports, studies, internal memoranda, contracts for services, and communications that reflect Sony designs or that include the name or logo of Sony (or "Jony"), depictions of Sony products, or references to Sony's design language. Please also produce the physical models that Apple created of the designs generated from this exercise/investigation. These materials are responsive to at least Samsung's Request for Production Nos. 16 and 98.

Also, it appears Apple created designs based on other smart phones, including but not limited to the Treo and the Razr. *See, e.g.*, documents bearing productions numbers APLNDC0000036646, 36657, 36892, 37167, 37177. Please produce the documents related to these exercises/investigations, including but not limited to the notebooks, diagrams, progress reports,

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studies, internal memoranda, contracts for services, and communications that include the names or logos of these and all other prior art smart phones. Please also produce the physical models or prototypes created in connection with these exercises/investigations.

Very truly yours,

/s/

Michael T. Zeller