

# EXHIBIT 7

February 1, 2012

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*By Email* (dianehutnyan@quinnemanuel.com)

Diane Hutnyan  
Quinn Emanuel  
865 Figueroa St., 10th Floor  
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Re: *Apple v. Samsung*, Case No. 11-cv-1846-LHK (N.D. Cal.)

Dear Diane:

I write in response to your January 24, 2012 letter regarding Brain Box, Apple Cinema Display, Sony, Treo/Razr, and Phillips receiver test reports.

Pursuant to the Court's December 22 Order (Dkt. No. 536), Apple searched for and produced documents and things relating to 1) investigations into other smartphone designs and languages, if any, and 2) earlier Apple flat panel and Apple Cinema display models.

Before January 15, Apple ran searches for the keywords "Sony," "Treo," "Razr," "Philips," "Phillips," and "brain box" against documents and email collected from Industrial Design inventors and produced any responsive hits.

Apple searched in its model database for "Treo," "Razr," and "brain box" and did not find any responsive hits. Apple searched in its model database for "Sony" and found only a small number of hits related to released iPhone projects, and thereafter, Apple produced for inspection *all* Industrial Design models from released iPhone, iPad and iPod touch projects. Apple also produced any models that hit "Philips" or "Phillips" in the database, as well as all prior art Apple Cinema Display models and CAD, as noted in my January 13 letter. Your letter acknowledges the Apple Cinema Display model and CAD production.

Apple's search of Industrial Design inventor documents and emails included all of the search terms proposed in your December 30 letter with the following exceptions:

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- *cinema* — Apple did not execute a search for the overbroad “cinema” term by itself, which a test search immediately revealed would return a substantial volume of wholly irrelevant material such as discussions of foreign cinema. Instead, Apple searched the phrase “cinema display.”
- “*Jony*” *within 50 of \*phone\** — This proposed search phrase is overbroad on its face and not reasonably directed at any design investigation.

Sincerely,

*/s/ Jason R. Bartlett*

Jason R. Bartlett

cc: Samuel Maselli  
S. Calvin Walden  
Peter Kolovos