

quinn emanuel trial lawyers | silicon valley

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

WRITER'S DIRECT DIAL NO.
(650) 801-5022WRITER'S INTERNET ADDRESS
victoriamaroulis@quinnemanuel.com

August 30, 2011

VIA E-MAILStephen E. Taylor
One Ferry Building
Suite 355
San Francisco, CA 94111Re: Apple Inc. v. Samsung Electronics Co., Ltd. et. al. No. 11-CV-01846-LHK

Dear Mr. Taylor:

I am writing in regard to the Court's August 30, 2011 Order (D.N. 191) directing Samsung to respond to the filing of the Notice of Withdrawal of Bridges & Mavrakakis LLP ("B&M"). The Court seeks Samsung's position on whether this withdrawal moots Samsung's Motion to Disqualify Plaintiff's Counsel.

Before Samsung can consider removing this motion from the Court's consideration, Samsung needs assurances regarding B&M attorneys further participation in this case.

We thus write to you to inquire whether Apple and its counsel will enter a stipulation that:

1. B&M will not disclose to Apple or Apple's current counsel any confidential information relating to its prior representation of Samsung.
2. B&M will not provide support services, consult, or participate in any further aspects of this case or related cases.

quinn emanuel urquhart & sullivan, llp

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

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

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

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

TOKYO | NBF Hibiya Bldg., 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

3. B&M will share no further work product it may have created during its participation in this case.

4. Apple and its current counsel return to B&M any work product prepared by B&M prior to its withdrawal.

Given the Court's Order that Samsung respond by Wednesday August 31, 2011, we request a response to this letter by 10:00 am PST tomorrow, August 31, 2011.

Please feel free to call me to discuss the issues raised in this letter.

Regards,

/s/ Victoria F. Maroulis

Victoria F. Maroulis