

Exhibit B

Bartlett, Jason R.

From: Bartlett, Jason R.
Sent: Friday, September 09, 2011 5:55 PM
To: 'Victoria Maroulis'
Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang
Subject: RE: Apple/Samsung: PI deposition dates

Victoria,

Regardless of whether Samsung is willing to participate in briefing on Apple's proposed schedule, it is urgent that we start the meet and confer process now. Please let us know if you are willing to meet at your office Monday.

As for the proposed briefing schedule, I do not understand why additional time is needed to brief the simple issue of whether a 30(b)(6) deposition has to be limited to 7 hours.

Sincerely,

Jason R. Bartlett
Morrison & Foerster
425 Market St.
San Francisco, CA 94105
Direct: 415.268.6615

From: Victoria Maroulis [mailto:victoriamaroulis@quinnemanuel.com]
Sent: Friday, September 09, 2011 5:46 PM
To: Bartlett, Jason R.
Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang
Subject: RE: Apple/Samsung: PI deposition dates

Jason,

I am available to meet and confer on Tuesday after the hearing. We can use the attorney lounge downstairs. On Tuesday, please be prepared to discuss a reasonable expedited briefing schedule. I note that Apple insisted on getting 9 days to prepare its opposition on a simple motion to compel which the parties discussed for weeks, forcing Samsung's counsel to work all of the forthcoming weekend on a reply to the opposition Apple is yet to serve tonight.

While we can discuss this further on Tuesday, Apple's witnesses you reference were noticed in dual capacity, as individuals and as 30(b)(6) witnesses. Therefore, Samsung was entitled to depose them for 14 hours. Instead, Samsung used less than 7 hours with Ms. Twigg and approximately 8-9 hours with Mr. Lutton. Similarly, although Mr. Stringer was supposed to appear as a 30(b)(6) witness and witness in his personal capacity, Apple cut off his deposition after 7 hours.

Separately, please confirm Samsung's 30(b)(6) deposition on September 21 in Dallas, and please select a deposition date for Mr. Johnson as soon as possible because he needs to start scheduling other engagements presently.

9/12/2011

Best Regards,

Victoria Maroulis

Partner,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bartlett, Jason R. [mailto:JasonBartlett@mofocom.com]

Sent: Thursday, September 08, 2011 11:28 PM

To: Victoria Maroulis

Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang

Subject: RE: Apple/Samsung: PI deposition dates

Victoria,

Seven hours for all of Apple's 30(b)(6) topics is not acceptable or reasonable. As you may recall, Samsung went significantly longer than seven hours with Chip Lutton, who was Apple's designee on only a single one of Samsung's 30(b)(6) topics. Indeed, Samsung claimed that it was entitled to 14 hours of deposition to depose Mr. Lutton in his personal capacity and on his single 30(b)(6) topic. Samsung took a full day with Sissy Twiggs, Apple's designee on just one portion of one topic, and full days with several other witnesses.

If this is really Samsung's position, we need to bring the issue to Magistrate Grewal's attention immediately. We suggest the parties present the issue in a brief joint letter. We suggest that each side limit itself to a maximum of two pages of single-spaced text, to be exchanged by 9:00 am Monday morning. We are available to meet and confer in person on Monday morning. If we cannot resolve the issue then, we propose to submit the letter and jointly request that Magistrate Grewal take up the issue during the already scheduled hearing on Tuesday morning.

Sincerely,

Jason R. Bartlett
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425 Market St.
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Direct: 415.268.6615

From: Victoria Maroulis [mailto:victoriamaroulis@quinnemanuel.com]

Sent: Thursday, September 08, 2011 5:36 AM

To: Bartlett, Jason R.

Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang

Subject: RE: Apple/Samsung: PI deposition dates

9/12/2011

Jason,

We will arrange for the inspection at the time you requested.

With respect to the 30(b)(6) deposition, Apple is entitled to 7 hours under the Federal Rules of Civil Procedure. Therefore, the deposition will last one day. Please provide us with the location in Dallas where you wish to conduct the deposition on the 15th and the start time.

Thank you.

Victoria Maroulis

Partner,

Quinn Emanuel Urquhart & Sullivan, LLP

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From: Bartlett, Jason R. [mailto:JasonBartlett@mofo.com]

Sent: Wednesday, September 07, 2011 6:41 PM

To: Victoria Maroulis

Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang

Subject: RE: Apple/Samsung: PI deposition dates

Victoria,

We will take the Fidler deposition in Columbia. We will need to view the prototypes the evening before the deposition, however. Can you arrange to present them around 7:00 pm on 9/22?

We will move forward with the 30(b)(6) deposition on the 15th, but a single day will be insufficient to cover all of the 30(b)(6) topics. When Samsung will be available to continue?

Sincerely,

Jason R. Bartlett
Morrison & Foerster
425 Market St.
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From: Victoria Maroulis [mailto:victoriamaroulis@quinnemanuel.com]

9/12/2011

Sent: Tuesday, September 06, 2011 7:08 PM

To: Bartlett, Jason R.

Cc: Kevin Johnson; Michael T Zeller; Todd Briggs; Margret Caruso; Sara Jenkins; Melissa Chan; Mark Tung; Ron Hagiz; Heather Belville; Hung, Richard S. J.; Ahn, Deok Keun Matthew; Jacobs, Michael A.; Eric Huang

Subject: RE: Apple/Samsung: PI deposition dates

Jason,

1. We are holding Mr. Johnson's dates pending your selection.
2. Mr. Fidler has very tight work schedule and needs to be deposed in Columbia. The best way to get there from San Francisco is to fly to St Louis and drive for about 1.5 hrs.
3. There will be one 30(b)(6) deponent. If the proposed date of September 15 does not work, we propose September 22 or 23. Please confirm at your earliest opportunity.

Thank you.

Victoria Maroulis

Partner,

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