

EXHIBIT C

October 3, 2011

Peter J. Kolovos

Via Email

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Victoria F. Maroulis, Esq.
Rachel Herrick Kassabian, Esq.
Quinn Emanuel Urquhart & Sullivan, LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065-2139

Re: Apple Inc. v. Samsung Electronics Co. Ltd. et al.,
Case No. 11-cv-01846-LHK (N.D. Cal.)

Dear Victoria and Rachel:

By letter dated September 14, we requested a meet and confer pursuant to Local Rule 30-1 to discuss scheduling the depositions of the named inventors of the Samsung patents in suit (among other Samsung employees). Victoria responded by email the next day to indicate that you were checking with your client on the availability of the witnesses. During our meet and confer call on September 23, Rachel stated that you were still working on scheduling these depositions.

Nearly three weeks have now passed since we identified these witnesses, but Samsung still has not provided even a single date for the deposition of a single named inventor or anyone else identified in my letter. Given the Court's order that Samsung make its named inventors and prosecuting attorneys available for deposition before December 1, we need to start setting dates for these depositions right away. Please confirm that Samsung will start to provide inventor deposition dates this week. If Samsung is unable or unwilling to do so, we should meet and confer on this issue.

Separately, we plan to notice the depositions of the Samsung employees identified in my September 14 letter to take place at WilmerHale's Palo Alto office. If Samsung objects to these depositions occurring in the United States, please let us know when you are available to meet and confer.

Finally, we will be issuing deposition subpoenas for the prosecuting attorneys of the Samsung patents in suit within the next few days. Please let us know by the end of the day tomorrow whether you will accept service of these subpoenas, or whether we should proceed with service on the deponents. Given the December 1 deadline, we also should discuss the scheduling of these depositions during our next meet and confer.

Victoria F. Maroulis, Esq.
Rachel Herrick Kassabian, Esq.
October 3, 2011
Page 2

Very truly yours,

A handwritten signature in black ink, appearing to read "Peter J. Kolovos". The signature is fluid and cursive, with the first name "Peter" and last name "Kolovos" clearly distinguishable.

Peter J. Kolovos

cc: Melissa N. Chan, Esq.
Jason R. Bartlett, Esq.
Richard S.J. Hung, Esq.
Mark D. Selwyn, Esq.
(all via email)