

# EXHIBIT D

October 3, 2011

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Via E-Mail (rachelkassabian@quinnemanuel.com)

Rachel Herrick Kassabian  
 Quinn Emmanuel  
 555 Twin Dolphin Drive, 5th Floor  
 Redwood Shores, CA 94065-2139

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

Dear Rachel:

As you know, over the past two weeks Apple has provided Samsung with a series of dates for prosecutor and inventor depositions. I thought it would make sense to confirm the schedule of all of the inventor and prosecutor dates confirmed by Apple to date. Note that this includes new design inventors — Freddy Anzures, Duncan Kerr, and Peter Russell-Clarke — that were the subject of an email from me earlier tonight.

<b>Date</b>	<b>Deponent's Last Name</b>	<b>Type</b>	<b>When Apple Offered Date to Samsung</b>
September 30, 2011	Allen	Prosecutor	September 21, 2011
September 30, 2011	Szepesi	Prosecutor	September 21, 2011
October 3, 2011	Schweigert	Prosecutor	September 21, 2011
October 3, 2011	Xie	Prosecutor	September 21, 2011
October 4, 2011	Scheller	Prosecutor	September 21, 2011
October 5, 2011	Williams	Prosecutor	September 21, 2011
October 5, 2011	Beyers	Prosecutor	September 21, 2011
October 5, 2011	Peloquin	Prosecutor	September 21, 2011
October 6, 2011	Mallie	Prosecutor	September 21, 2011
October 6, 2011	Wong	Prosecutor	September 21, 2011
October 7, 2011	Durkin	Prosecutor	September 21, 2011
October 7, 2011	Rossin	Prosecutor	September 21, 2011
October 10, 2011	Kubota	Prosecutor	September 21, 2011
October 10, 2011	Weaver	Prosecutor	September 21, 2011
October 12, 2011	Chartove	Prosecutor	September 21, 2011
October 12, 2011	Williamson	Utility Inventor	September 22, 2011

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<b>Date</b>	<b>Deponent's Last Name</b>	<b>Type</b>	<b>When Apple Offered Date to Samsung</b>
October 12, 2011	McNight	Prosecutor	September 21, 2011
October 13, 2011	Elias	Utility Inventor	September 22, 2011
October 14, 2011	Blumenberg	Utility Inventor	September 30, 2011
October 14, 2011	Herz	Utility Inventor	September 27, 2011
October 14, 2011	Lemay	Utility Inventor	September 22, 2011
October 14, 2011	Chaudhri	Utility Inventor	September 22, 2011
October 18, 2011	Huppi	Utility Inventor	September 27, 2011
October 18, 2011	Platzer	Utility Inventor	September 22, 2011
October 18, 2011	Christie	Utility Inventor	September 30, 2011
October 18, 2011	Anzures	Design Inventor	October 3, 2011
October 19, 2011	Ording	Utility Inventor	September 22, 2011
October 19, 2011	Hotelling	Utility Inventor	September 30, 2011
October 20, 2011	Land	Utility Inventor	September 30, 2011
October 20, 2011	Strickon	Utility Inventor	September 27, 2011
October 25, 2011	Hoellwarth	Prosecutor	September 30, 2011
October 25, 2011	Russell-Clarke	Design Inventor	October 3, 2011
October 26, 2011	Boule	Utility Inventor	September 30, 2011
October 26, 2011	Christensen	Utility Inventor	September 30, 2011
October 26, 2011	Van Os	Utility Inventor	September 30, 2011
October 26, 2011	Kerr	Design Inventor	October 3, 2011
October 27, 2011	Forstall	Utility Inventor	September 30, 2011

As discussed in previous meet-and-confer communications, we will continue sending confirmed dates as soon as we have them, and expect by the end of the week to have dates for all remaining witnesses who are current employees or jointly represented. Also as discussed in previous meet-and-confer communication, Apple intends to complete its production of documents for each deponent no later than five days before his or her deposition.

Sincerely,

/s/ Matthew I. Kreeger

Matthew I. Kreeger

cc: Victoria Maroulis, Esq.