

Exhibit B

From: Mazza, Mia
Sent: Friday, December 02, 2011 11:14 AM
To: 'rachelkassabian@quinnemanuel.com'
Cc: Samsung v. Apple; AppleMoFo; 'Maselli, Samuel'; Walden, S. Calvin; Kolovos, Peter
Subject: Apple v. Samsung: Discovery Correspondence - Lead Trial Counsel meeting and Motions to Compel

Attachments: 2011-12-02 Ltr Mazza to Kassabian re LTCM&C.pdf

Hi Rachel,

Attached please find discovery correspondence regarding the lead trial counsel meeting and motions to compel.



2011-12-02 Ltr
Mazza to Kassab...

Mia Mazza
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December 2, 2011

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Via E-Mail (rachelkassabian@quinnemanuel.com)

Rachel Herrick Kassabian
Quinn Emanuel
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, California 94065

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

Dear Rachel:

As we discussed during Wednesday's meet-and-confer call, Harold McElhinny is available at any time on December 6 for a lead trial counsel meeting to discuss outstanding discovery issues for which the parties otherwise are prepared to move to compel. Mr. McElhinny is also available at any time on December 5, or at any time on December 7 except between noon and 3pm. You stated during the call that you would get back to us on scheduling this meeting, but thus far we have heard nothing from you, despite our making two additional email inquiries since Wednesday's meeting.

We understand that Samsung wishes to discuss at least the Sherman protective order issue and prior deposition transcripts. Apple wishes to discuss at least the establishment of a scope of production that Samsung will substantially complete by December 15, 2011. The currently proposed scope of production includes (1) the items of source code and other technical documents identified in Wes Overson's November 9 and 28 letters, (2) the results of Samsung's expanded search for survey-related documents, and (3) the results of Samsung's expanded search for emails and other documents mentioning "Apple," the Apple products at issue in this case, or aliases therefor. Apple is willing to consider a proposed scope of substantially complete production by December 15 on its part as well.

Apple's current proposal is that it will consider Samsung's scope of production substantially complete by December 15 if Samsung has made a good-faith, expedited effort to locate and produce the documents on or before that date. In addition, to the extent by that date Samsung has been unable to locate certain documents, or has located documents but has been unable to produce them yet, by December 15 Samsung will provide a written disclosure identifying what steps have been taken to complete the search for and production of

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documents, what additional steps need to be taken to complete the search for documents or production of documents that have been located, and an estimated date certain by when the documents that have been located will be produced.

Apple does not expect that either party will be in a position to certify completion of any or all portions of its document production until a later point in the discovery process.

In the event that motion practice is required, we will seek the following schedule:

- Motions to compel: Thursday, December 8
- Opposition briefs: Monday, December 12
- Reply briefs: Wednesday, December 14
- Hearing: Friday, December 16

Please let us know as soon as possible which day and what time Mr. Verhoeven can meet. As we discussed, Judge Grewal will not be hearing matters during the week of December 19. You represented that all attorneys from Quinn Emanuel will be unavailable during the week thereafter. Therefore, it is important that court intervention, if necessary, take place before the Winter holiday.

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: Samuel Maselli
S. Calvin Walden
Peter Kolovos