

EXHIBIT 3

December 7, 2011

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Via E-Mail (dianehutnyan@quinnemanuel.com)

Diane Cafferata Hutnyan
Quinn Emanuel
865 South Figueroa St., 10th Floor
Los Angeles, CA 90017

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

Dear Diane:

This letter is to confirm, as discussed during the parties' meet-and-confer discussion this evening and in previous correspondence, the written commitment that Samsung will need to make to avoid motion practice at this time:

- Samsung will substantially complete, by December 15, 2011, its production of "Apple" and survey documents, as summarized in sections 3 and 4 of my December 5, 2011, letter to Rachel Herrick Kassabian;
- Samsung will substantially complete, by December 15, 2011, its production of certain categories of source code and related technical documents, as summarized in my December 6, 2011, letter to Melissa Chan;
- Samsung will substantially complete, by December 23, 2011, its production of sketchbooks and physical models for Galaxy phone and tablet products, as summarized in my December 6, 2011, letter to Marissa Ducca; and
- Samsung will substantially complete, by December 31, 2011, its production of CAD created in connection with the design of Galaxy phone and tablet products, as summarized in my December 6, 2011, letter to Marissa Ducca.

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Samsung's commitment to the above scope and timing of substantially complete production must be provided to Apple in writing no later than noon Pacific time on Thursday, December 8, 2011. Absent such written confirmation, Apple intends to file, on December 8, its motion to compel this production, requesting a December 16, 2011, hearing on shortened time.

Sincerely,

/s/ *Mia Mazza*

Mia Mazza

cc: Samuel Maselli
S. Calvin Walden
Peter Kolovos