

Exhibit 10

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May 16, 2011

VIA E-MAIL

Jason R. Bartlett, Esq.
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Re: Apple, Inc. v. Samsung Electronics Co. Ltd., Samsung Electronics America, Inc.,
Samsung Telecommunications America, LLC, Case No. 11-cv-1846-LHK (N.D. Cal.)

Dear Jason:

I write pursuant to Judge Koh's order Thursday afternoon that the parties meet and confer concerning the reciprocal discovery that Samsung seeks from Apple in view of the discovery that Judge Koh ordered that Samsung produce to Apple. As reciprocal discovery, Samsung requests that Apple produce to Samsung by June 13, 2011¹:

1) a sample of the final, commercial version of the next generation iPhone that Apple will release, whether that product will be known as the "iPhone 4S," "iPhone 5," or some other name, along with the final version of the packaging in which this product will be delivered to retail customers and a final version of the insert(s) that will be included within such packaging; and

¹ This is the deadline Judge Koh ordered for Samsung's production to Apple of product samples, packaging, and packaging inserts of the Galaxy S2, Galaxy Tab 8.9, Galaxy Tab 10.1, Infuse 4G and 4G LTE.

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2) a sample of the final, commercial version of the next generation iPad that Apple will release, whether that product will be known as the “iPad 3,” “Third Generation iPad,” or some other name, along with the final version of the packaging in which this product will be delivered to retail customers and a final version of the insert(s) that will be included within such packaging.

Samsung needs each of these items to evaluate whether a likelihood of confusion exists between the Samsung and Apple products that will be in the market at the same time. If “final” or “commercial” versions of the products, packaging, and packaging inserts that Samsung requests are not available by June 13, 2011, then Samsung requests that the most current version of each be produced by that date instead. Samsung will afford these samples, packaging and inserts the same level of confidentiality protection under Patent L.R. 2-2’s Interim Protective Order, as modified by Judge Koh, that Apple must afford to Samsung’s product samples.

Unless and until we learn more information from Apple about what products, and on what basis, Apple intends to move for a preliminary injunction, Samsung cannot narrowly tailor its requests for additional discovery necessary to defend against Apple’s motion. Accordingly, by requesting the specific product samples, packaging and packaging inserts described above, Samsung in no way waives its right to seek further discovery relevant to Samsung’s defense against any potential preliminary injunction motion Apple may file in these proceedings.

Please let me know if Apple agrees to produce the requested discovery by June 13, 2011.

Sincerely,

/s/ Victoria F. Maroulis

Victoria F. Maroulis

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