

Exhibit B

January 2, 2012

VIA E-MAIL

Mia Mazza
Morrison & Foerster, LLP
425 Market Street
San Francisco, CA 94105-2482

Re: Apple v. Samsung Electronics, et al., No. 5:11-cv-01846-LHK (N.D.Cal.)

Dear Mia:

I am writing to follow up on my letter of December 30 regarding the impending lead counsel in-person meet and confer on January 5. Samsung requests that Mr. McElhinny be prepared to discuss the issues below, for which the parties are currently at an impasse.

- Apple's failure to produce a *working* computer that was in public use before July 10, 2001 that has a brightness adjustment button, and is running the Mac OS X v. 10.0 software that was in public use before July 10, 2001, and Apple's failure to produce documents sufficient to show when the code Apple produced became part of a commercial release or otherwise available to the public (12/29/11 Ducca Letter)
- Apple's failure to return Samsung's memory sticks containing Samsung's work product, and Apple's failure to confirm that it destroyed all of Samsung's work product (12/29/11 Hutnyan Letter)
- Apple's failure to de-designate the pictures of the publicly disclosed features of the 035 mock-up (12/29/11 Hutnyan Letter)

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- Apple’s failure to produce all relevant source code and technical documents (1/2/12 Hutnyan Letter)
- Apple’s failure to produce all relevant documents referencing “Samsung” and other relevant terms (1/2/12 Hutnyan Letter)
- Apple’s failure to produce all relevant surveys and marketing documents (1/2/12 Hutnyan Letter)
- Apple’s failure to produce relevant financial documents (1/2/12 Hutnyan Letter)
- Apple’s failure to produce all relevant MCOs, working prototypes, and models (12/31/11 Hutnyan Letter)
- Apple’s failure to produce the NEXT OS source code (12/27/11 Suh Letter)
- Apple’s failure to produce source code for Mac OS X Tiger (12/28/11 Suh Letter)
- Apple’s failure to produce an unredacted version of its license with Nokia (12/28/11 Suh Letter)
- Apple’s failure to produce all relevant documents identified during Sissie Twigg’s deposition (12/30/11 Suh Letter)
- Apple’s failure to produce all relevant sketchbooks (12/30/11 Hall Letter)
- Apple’s failure to run adequate searches on its inventor documents, and failure to produce relevant inventor documents that should be found with adequate searches (12/30/11 Hall Letter)
- Apple’s improper objections to Samsung’s 30(b)(6) deposition notice (12/30/11 Hutnyan Letter)
- Apple’s incomplete responses to certain RFPs (12/30/11 Hutnyan Letter)
- Apple’s failure to produce Jonathan Ive for another day of deposition (12/31/11 Hutnyan Letter)
- Apple’s failure to make available documents and things in the Stanford archive (1/1/12 Suh Letter)

As you know, most of these disputes have been languishing for weeks and have been the subject of several meet and confers. Since the last meet and confer, we have sent you updated correspondence about these issues (which we have referenced for your convenience). The purpose of this correspondence was to respond to the questions you had on that call, and/or to

gather more information about Apple's position, so that we can advance these discussions. Yet we have received neither a substantive response to these letters, nor has any member of Apple's team proposed a single phone call in response (I am excluding Apple's disingenuous proposal to talk last week, when we had previously told you we were unavailable for such a discussion). Apple's sudden silence seems especially odd because you claimed to be prepared to meet and confer last week, and also because you always seem to be willing and able to make time to talk about Apple's discovery issues.

Of course, we need not meet and confer again before the lead counsel meet and confer. But given the number and breadth of the issues, and the busy schedules of our lead counsel, we think it makes sense to schedule some short calls with the attorneys most knowledgeable about these issues, to see if we can finally hammer out some agreements and narrow the issues. To that end, we remain available tomorrow and Wednesday for such calls. Please let us know if and when you would like to talk about any of them.

Kind regards,

/s/

Diane C. Hutnyan