Exhibit A

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January 8, 2012

VIA ELECTRONIC MAIL

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

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

Dear Mia:

Thank you for your letter.

I note that it fails to respond to a number of issues that we discussed during the meeting on Thursday.

Also, among other representations and characterizations in the letter, your description of what happened at the meet-and-confer in Section "G" is false as you have worded it. During the meeting, Mr. McElhinny told us in no uncertain terms, that Apple would not provide any witnesses for any topic in our Rule 30(b)(6) deposition notice and that we had to "withdraw" it; and that Apple would not provide any additional time with Ive. As you know, the proposal you advanced during that meeting, and that you reference in your letter, only dealt with the 49 Apple witnesses noticed personally, and specifically excluded Jonathan Ive and the 30(b)(6) witnesses.

Please let me know immediately if Apple is now changing its position with respect to the deposition of Ive and to the noticed 30(b)(6) topics, and if so, specifically what its position now is.

Additionally, regarding the Protective Order, and your newly unveiled proposal in response to the "confidential" tier we proposed almost two weeks ago, you have provided no rationale whatsoever for Apple's insistence on full disclosure and objection for documents and other materials falling within the "confidential" tier. Why should Samsung have to disclose consultants that are merely looking at "confidential" documents? Consultants' identities are attorney work product, and there is no reason that Samsung should have to disclose their identities or other information and subject them to an objection process with respect to "confidential" documents, especially when they have already agreed to be bound by the provisions of the Protective Order by signing a copy of Exhibit A; and are not a current officer, director, or employee of a Party, nor anticipated at the time of retention to become an officer, director or employee of a Party.

That said, we will agree to the confidential tier with the "edit" you describe in your letter if you will agree that Itay Sherman may see any design-related items that are designated "Confidential."

Please let me know Apple's position on this proposal immediately to avoid wasteful motion practice.

Kind regards,

/s/

Diane C. Hutnyan