

EXHIBIT BB

WRITER'S INTERNET ADDRESS
melissachan@quinnemanuel.com

October 21, 2011

VIA ELECTRONIC MAIL

S. Calvin Walden
Wilmer Cutler Pickering Hale and Dorr LLP
399 Park Avenue
New York, New York 10022

Re: Apple Inc. v. Samsung Elecs. Co., et al., Case No. 11-CV-01846-LHK (N.D. Cal.)

Dear Calvin:

I write in response to your October 13, 2011, letter to Victoria Maroulis on Requests for Production Nos. 53-155.

Documents Relating to Inventor and Prosecuting Attorney Depositions

For documents relating to the inventors and prosecuting attorney depositions that are scheduled to occur during the month of November, either (1) we have already produced such documents with Samsung's infringement contentions or (2) we will produce them five days in advance of the deposition date, per the parties' agreement. We reiterated that on the meet and confer call on October 19, 2011.

Regarding Samsung's licenses and license-related documents or documents relating to standards organizations, we intend to produce documents relevant and responsive to such requests, subject to our written objections. However, we do not anticipate that such productions will occur before all of the depositions of Samsung's inventors and prosecuting attorneys. If you believe that these documents are relevant to the depositions that must be conducted per Court order by December 1, 2011, please explain in detail the basis of your position, including an explanation of how such documents are relevant to one or more of those depositions.

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100
NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100
SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700
CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401
WASHINGTON, DC | 1101 Pennsylvania Avenue NW, 6th Floor, Washington, District of Columbia 20004-2544 | TEL (202) 756-1950 FAX (202) 756-1951
LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100
TOKYO | NBF Hibiya Bldg., 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712

2. “Meet and Confer” Responses to Requests for Production

As we’ve discussed during several meet and confer conferences, Samsung is collecting and will produce relevant, non-privileged documents, subject to its written objections. Based on our preliminary review of the categories in your letter, we have concerns about many of the requests, including requests where you seek information that is subject to work product privileges or otherwise are or will be included with filed or served documents (*see, e.g.*, RFP Nos. 61, 94, 95, 96, 110, 111), or requests where you seek information about employee compensation and bonuses, which are irrelevant and implicate privacy concerns (*see, e.g.* RFP Nos. 76-78, 140, 141). We are unclear as to what you are seeking in Request No. 155, where you ask for “[a]ll documents relating to any Samsung policy or practice for compliance with any federal state antitrust, unfair competition, or unfair trade practices law.” For the other requests, we are investigating, searching for and collecting relevant documents.

We are willing to let you know which additional requests, if any, for which Samsung does not intend to produce any documents and requires a meet and confer for clarification, if Apple will do the same (as we have been requesting for weeks now). Please advise.

Finally, since the parties have agreed to a standing weekly meet and confer time, we can address issues with Apple’s deficient document production as well.

Very truly yours,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

/s/ Melissa N. Chan

Melissa N. Chan