

Exhibit 3

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June 1, 2011

VIA E-MAIL

Jason R. Bartlett, Esq.
Morrison & Foerster LLP
425 Market Street
San Francisco, CA 94105

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:

This responds to your May 31, 2011 letter to Victoria Maroulis. Your assertion that our motion to compel mischaracterizes the record is incorrect, and we decline your request that we withdraw it.

While we do not address all the points raised in your letter, one warrants immediate correction. Your statement that I “explained that Samsung is no longer seeking the discovery that Mr. Verhoeven requested during the hearing” is wrong. We trust you simply misremember the conversation. During our May 23 teleconference, I explained that the Court’s May 18, 2011 “Order Granting Limited Expedited Discovery” defined the scope of information the parties were required to produce to one another during the limited expedited discovery period. This includes the product samples, packaging, and packaging inserts we requested relating to Apple’s future iPhone and iPad products. I in no way disavowed Samsung’s right to seek additional discovery beyond this. Furthermore, Ms. Maroulis’ May 16 letter to you also made clear that Samsung may request additional discovery from Apple:

Unless and until we learn more information from Apple about what

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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.

Thus, Samsung has explicitly reserved its right – and hereby reiterates its right – to seek discovery beyond the specific product samples, packaging, and packaging inserts that are the subject of Samsung's currently pending motion to compel.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Briggs". The signature is written in a cursive, slightly slanted style.

Todd M. Briggs

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