

# Exhibit M

January 3, 2012

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*Via E-Mail* (rachelkassabian@quinnemanuel.com)

Rachel Herrick Kassabian  
Quinn Emanuel  
55 Twin Dolphin Dr., 5th Floor  
Redwood Shores, CA 94065

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

Dear Rachel:

We write as a follow-up to our November 29, 2011 letter, and your January 2, 2012, response, regarding Samsung's blue glow functionality. As noted in our November 29 letter, Samsung appears to have incorporated a blue glow functionality into its products in an apparent attempt to design around certain Apple patents, including the '381 patent asserted in this action.

As stated in our November 29 letter, we have not found any documents regarding this blue glow functionality in Samsung's production thus far. We raised this issue in the parties' last meet-and-confer discussion and Samsung was unable to provide any information regarding its search for documents regarding the blue glow design-around.

In your January 2 letter, you state that, "[t]o date, "Samsung has located no responsive, non-privileged documents" regarding Samsung's blue glow functionality. We trust Samsung is not suggesting that Apple has failed to request these documents in its written discovery. Apple has requested production of all information regarding Samsung's design-around attempts, including:

- Documents sufficient to identify and show in detail each design around, allegedly non-infringing alternative manufacturing process, and/or alternative technology or method that can be used as an alternative to the patented technology of each of the Utility Patents at Issue.
- All Documents concerning each design around, and/or allegedly non-infringing alternative design that can be used as an alternative to the Design Patents at Issue.
- All Documents relating to each change Samsung made, is now making, or will make to the Products at Issue in response to Apple's allegations in this lawsuit.

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- All Documents relating to Samsung's analyses, actions, plans or attempts to exercise due care to avoid infringing the Patents at Issue.
- All Communications with Google or any other third party regarding design arounds for the Patents at Issue.

(See Requests for Production Nos. 20, 197-199 and 452.) These requests for production encompass all documents regarding the blue glow functionality, including various categories of non-privileged documents such as documents regarding the implementation of this functionality and communications with third parties regarding this feature.

If Samsung has failed to locate any documents regarding this blue glow functionality it can only be because it has not made a good-faith effort to look for them. That is unacceptable, especially at this point in the discovery process.

Apple requests that Samsung produce all responsive documents regarding its blue glow functionality and all other documents relating to or referencing design-arounds and non-infringing alternative designs to those used in Samsung's products at issue, by **January 23, 2012**.

Apple further requests that Samsung agree to participate in a working meet-and-confer call on Wednesday, January 4, 2012, to discuss Samsung's willingness to produce this scope of documents on that time frame. If the parties cannot reach a mutually satisfactory resolution on Wednesday, then this issue will be placed on the agenda for the January 5, 2012, lead counsel meeting.

Sincerely,

*/s/ Mia Mazza*

Mia Mazza

cc: Samuel Maselli  
S. Calvin Walden  
Peter Kolovos