

Exhibit F

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January 6, 2011

VIA ELECTRONIC MAIL

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

Re: Apple Inc. v. Samsung Elecs. Co. et al., Case No. 11-cv-1846 LHK

Dear Mia:

I write in response to your January 3, 2012 letter to Diane Hutnyan concerning production of marketing and advertising-related documents.

As a preliminary matter, given that Apple first initiated meet and confer on this issue on January 3, we will need some time to confer with our client before giving Apple our final position. To facilitate that decisionmaking process, please confirm the following:

- Your letter acknowledges that this general category of documents is reciprocal. Please confirm that if Samsung agrees to produce these documents, Apple will do the same, by a mutually agreed date certain.
- Please also confirm that Apple will produce the full scope of documents responsive to Samsung RFP Nos. 7, 15, 29, 44, 130, 131, 140, 141, 147, 163, 164, 169, 170, 177, 178, 183, 190, 191 and 249.
- To the extent that consumer confusion is the basis for Apple's argument that advertising

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Mia Mazza
January 6, 2011

and marketing documents are relevant, please explain why Apple has defined "Samsung's Products at Issue" to include numerous products that are not accused of infringing Apple's trademarks or trade dress.

- Please identify which of Apple's requests for production are directed at product placement requests. Additionally, Samsung objects to this request as overbroad because it is not limited to any reasonable time period, nor is it limited to the accused products.
- Please clarify what you mean in requesting a copy of any advertisement that "targets," "evokes" or "competes" with Apple or any of its products. Given that Apple and Samsung are competitors in the smartphone and tablet markets, this request literally seeks a copy of every advertisement Samsung has ever run anywhere in the world for any smartphone or tablet product. Moreover, this request is not limited to advertisements for the accused products. Such a request is oppressive and calls for irrelevant information.
- Please identify which Apple RFPs are directed at "documents referencing or relating to the number of times an online advertisement for any of Samsung's Products at Issue has been "clicked on" by a user." Similarly, please identify which Apple RFP is directed to "documents relating to any type of tracking that Samsung does or has done for any advertisement for any of Samsung's Products at Issue."

We look forward to your prompt response.

Very truly yours,

/s/

Rachel Herrick Kassabian