

Exhibit F

January 3, 2012

Writer's Direct Contact
415.268.6024
MMazza@mofocom

Via E-Mail (dianehutnyan@quinnemanuel.com)

Diane Hutnyan
Quinn Emanuel
865 S. Figueroa St., 10th Floor
Los Angeles, CA 90017

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

Dear Diane:

Apple requests that Samsung agree to substantially complete, by **January 23, 2012**, its production of marketing and advertising-related documents in the following categories:

- All product placement requests for any Samsung mobile phone or tablet computer product.
- All U.S. and global marketing and advertising strategy documents, marketing requirements documents, market analyses (including actual or projected market demand), market share analyses, competitor analyses, consumer surveys, and focus group studies relating to the Apple or Samsung Products at Issue, including but not limited to those that mention Apple, iPod, iPhone, iPad or any other nicknames or designations used by Samsung to indicate Apple or any of its products.¹
- Documents evidencing or referencing U.S. or global media plans.
- A copy of each U.S. advertisement and any drafts of each U.S. advertisement for any of Samsung's Products at Issue, including but not limited to print, television, billboard, radio, on-line, and airline advertisements, and documents sufficient to determine where and when each such advertisement appeared.
- Copies of any advertisements, wherever run, that mention or target Apple or any of its products, including but not limited to advertisements that are meant to evoke Apple or any of its products and/or to compete with Apple or any of its products.

¹ For purposes of this letter, Samsung "Products at Issue" includes all Galaxy phone and tablet products and all products identified in Apple's Amended Complaint. Apple "Products at Issue" includes all iPhone, iPod Touch, and iPad products.

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- 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.
- Documents referencing or relating to any type of tracking that Samsung does or has done for any advertisement for any of Samsung's Products at Issue, including the number of "impressions" expected for each advertisement.
- Documents sufficient to identify all markets and retail outlets where Samsung's Products at Issue are or will be sold.
- Documents describing how Samsung's Products at Issue are to be marketed or presented in retail outlets or by carriers, including but not limited to scripts or sales points to be used by salespeople.
- Documents referencing or relating to any incentives that Samsung offers to any retail outlet or carrier in connection with the sale of any of Samsung's Products at Issue.
- Documents sufficient to identify all markets and media outlets where Samsung's Products at Issue are or will be advertised.
- Documents sufficient to show per-month advertising and marketing spending in the U.S. regarding the Products at Issue.
- Documents sufficient to identify the demographics of likely or targeted customers for each of Samsung's Products at Issue.

We note that these are most of these are categories that Apple has already offered to produce reciprocally.

Apple requests that Samsung substantially complete its production of these documents by **January 23, 2012**. Apple further requests that Samsung 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 J. Kolovos