

# Exhibit A

**From:** [Maselli, Samuel](#)  
**To:** ["melissachan@quinnemanuel.com";](#)  
**cc:** ["Samsungv.Apple@quinnemanuel.com"; "AppleMoFo";](#)  
[WH Apple Samsung NDCal Service;](#)  
**Subject:** FW: Apple v. Samsung: discovery correspondence  
**Date:** Tuesday, December 06, 2011 7:16:05 PM  
**Attachments:** [12-2-2011 M Chan letter to W Overson.pdf](#)

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Melissa,

I write in response to your attached December 2 letter seeking, among other things, Apple's confirmation that it will be producing various categories of source code and other technical documents related to the Accused Products.

With regard to Samsung's requested production of Apple's source code, please be advised that Apple is currently prepared to produce the following responsive source code in accordance with the terms of the Interim Protective Order:

- Portions of the Photos app, Photo Bucket app, and Camera app source code that relate to capturing images, displaying images, and attaching images to e-mail;
- Portions of the iPod and Music app source code that relate to playing music;
- Portions of the Clock app source code that relate to a world clock and time information;
- Portions of the Messages app source code that relate to display of incoming and outgoing messages; and
- Portions of Apple's source code relating to display of the app multitasking bar shown when a user double-clicks the Home button.

Moreover, as we have discussed, many of the categories of technical documents identified in your attached letter have been produced in the 794 investigation, and will be available for your use in this action subject to our imminent agreement on cross-use. (See 12/6/11 E-mail from Maselli to Kassabian.) In addition, Apple's production efforts are ongoing in this action, and, subject to its objections and the parties' meet and confer discussions (and related agreements), Apple will continue to produce non-privileged documents in response to Samsung's requests to the extent they are in Apple's possession, custody or control and can be identified after a reasonable search, including the identified categories of documents in your letter.

Regards,

Sam Maselli

**Samuel Maselli | WilmerHale**

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**From:** Melissa Chan [mailto:[melissachan@quinnemanuel.com](mailto:melissachan@quinnemanuel.com)]

**Sent:** Friday, December 02, 2011 5:19 PM

**To:** 'Overson, Wesley E.'; 'Mazza, Mia'

**Cc:** Rachel Herrick Kassabian; Diane Hutnyan; Joby Martin; 'AppleMoFo'; WH Apple Samsung NDCal Service

**Subject:** Apple v. Samsung: discovery correspondence

Counsel,

Please see the attached correspondence.

Thanks,  
Melissa

**Melissa Chan**

**Quinn Emanuel Urquhart & Sullivan, LLP**

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