

Exhibit C

From: [Kolovos, Peter](#)
To: [Diane Hutnyan](#); [Scott Hall](#); [Rachel Herrick Kassabian](#); [Melissa Chan](#);
cc: [Maselli, Samuel](#); [Walden, S. Calvin](#); "Mazza, Mia"; "AppleMoFo"; [Kolovos, Peter](#);
Subject: RE: Apple v. Samsung: Discovery Correspondence - Source Code, "Samsung", Survey, and Financial Documents
Date: Tuesday, January 03, 2012 2:53:58 PM

Diane,

I write regarding your request, as set forth in your January 2, 2012 letter, that we make source code for the Apple accused products available for inspection.

On December 6, 2011, we informed you that Apple was "currently prepared" to produce source code for the Apple accused products. See Sam Maselli Dec. 6, 2011 E-mail to Melissa Chan ("Apple is currently prepared to produce the following responsive source code in accordance with the terms of the Interim Protective Order."). You are wrong to assert that Apple "failed to produce these materials for inspection or provide a firm date for their production" or that Apple has "intentionally withheld" source code. Apple did not inform Samsung that it was "preparing" to produce code on some date in the future, but instead stated that it was "currently prepared" to do so, which should have signified that Apple was prepared, *at that time* (and at all times since), to produce the code for inspection. For whatever reasons, Samsung chose not to accept Apple's prior invitation to inspect that source code.

We are still prepared to produce the source code outlined in Sam Maselli's December 6, 2011 e-mail. In your letter, you ask to start the inspection by January 10, 2012. Samsung may begin its inspection at any time (during regular business hours, or at times agreed-upon by the parties) on or before that date at WilmerHale's Palo Alto offices. Apple's code has been available for inspection for weeks, it is thus obviously available now, and will be available on January 10, if that is the date Samsung chooses to begin its inspection. Please let us know when Samsung would like to begin conducting its inspection, and who will be attending the inspection.

-- Peter

From: Scott Hall [<mailto:ScottHall@quinnemanuel.com>]
Sent: Monday, January 02, 2012 1:09 PM
To: 'Mazza, Mia'; 'AppleMoFo'
Cc: Rachel Herrick Kassabian; Diane Hutnyan; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin
Subject: Apple v. Samsung: Discovery Correspondence - Source Code, "Samsung", Survey, and Financial Documents

Mia,

Please see the attached correspondence.

Thanks,

Scott Hall
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
650-801-5027 Direct
650.801.5000 Main Office Number
650.801.5100 FAX
ScottHall@quinnemanuel.com
www.quinnemanuel.com

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