Apple Inc. v. Samsung Electronics Co. Ltd. et al

## Exhibit D

Dockets.Justia.com

From: Bartlett, Jason R.

Sent: Saturday, January 07, 2012 11:01 AM

To: 'brettarnold@quinnemanuel.com'; Mazza, Mia

Cc: 'rachelkassabian@quinnemanuel.com'; AppleMoFo; 'Samsungv.Apple@quinnemanuel.com';

'Samuel.Maselli@wilmerhale.com'; 'Peter.Kolovos@wilmerhale.com'; 'Calvin.Walden@wilmerhale.com'

Subject: Re: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

Follow Up Flag: Follow up

Flag Status: Red

Brett,

Apple will produce the 035 CAD in pdf form to you by ftp this weekend as soon as possible.

We are working on getting the file to open at the escrow facility in native form. We should have it worked out by Tuesday.

Jason

From: Brett Arnold <brettarnold@quinnemanuel.com>

To: Brett Arnold <brettarnold@quinnemanuel.com>; Bartlett, Jason R.; Mazza, Mia

**Cc**: Rachel Herrick Kassabian <rachelkassabian@quinnemanuel.com>; AppleMoFo; Samsung v. Apple <Samsungv.Apple@quinnemanuel.com>; 'Maselli, Samuel' <Samuel.Maselli@wilmerhale.com>; 'Kolovos, Peter' <Peter.Kolovos@wilmerhale.com>; 'Walden, S. Calvin' <Calvin.Walden@wilmerhale.com> **Sent**: Sat Jan 07 10:37:48 2012

Subject: RE: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

Jason,

Please respond to my emails below. After several reviews, we are still unable to find the CAD files of the 035 model that Apple has indicated were added to the review computer at the escrow facility. This is now the fourth time we're asking for this basic information, and we have yet to receive any response. As I'm sure you can appreciate, we do not want to continue wasting time travelling to the review site and hunting for these documents.

Regards, Brett

From: Brett Arnold
Sent: Friday, January 06, 2012 9:45 AM
To: Bartlett, Jason R.; Mazza, Mia
Cc: Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin
Subject: RE: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

Hi Jason,

I don't believe we've received a response from you yet. Can you please provide guidance on the questions below? We've been unable to locate certain files you've indicated are at the escrow facility. Thank you.

Best regards, Brett From: Brett Arnold
Sent: Thursday, January 05, 2012 11:13 AM
To: Bartlett, Jason R.; Mazza, Mia
Cc: Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin
Subject: RE: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

Jason,

Can you please advise as soon as possible regarding my questions below? Thank you.

Best regards, Brett

From: Mazza, Mia [mailto:MMazza@mofo.com]
Sent: Wednesday, January 04, 2012 3:04 PM
To: Brett Arnold
Cc: Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin
Subject: RE: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

How many pages of each kind of paper are you requesting? We can send a messenger shortly.

I will need to have Jason follow-up with you regarding the specific location of the new 035 files and the Alias program.

From: Brett Arnold [mailto:brettarnold@quinnemanuel.com] Sent: Wednesday, January 04, 2012 2:52 PM

To: Brett Arnold

**Cc:** Mazza, Mia; Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin **Subject:** Re: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

Hi Mia,

Can you please arrange for more paper to be delivered to the escrow facility as soon as possible? There appear to be thousands of files added to the computer, but there are only about 30 sheets of the Outside Counsel Only paper, and 80 sheets of AEO paper.

Also, can you please confirm which directory contains the new 035 model files? The Dec. 21 folder appears to contain just the announced products and the Dec. 23 folder only has two files that are visible in the directory, neither of which will open:

q63\_tabletB\_1024.igs tab\_30pin\_1024.2

Are those two folders the only two new directories?

Also, the Alias program is consistently crashing. Please advise if there is a solution for this.

Regards, Brett

On Jan 4, 2012, at 11:40 AM, "Brett Arnold" <<u>brettarnold@quinnemanuel.com</u>> wrote:

Hi Mia, Do you know how many additional CAD files we should expect to see? Thanks, Brett

From: Mazza, Mia [mailto:MMazza@mofo.com]

Sent: Friday, December 30, 2011 3:08 PM
To: Rachel Herrick Kassabian
Cc: AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin
Subject: Apple v. Samsung: Discovery Correspondence - Production for Inspection of additional CAD files in escrow

<<2011-12-30 Ltr Mazza to Kassabian re CAD.pdf>>

Hi Rachel,

Attached please find correspondence regarding Apple's production for inspection of additional CAD files at the established escrow facility.

Regards,

Mia Mazza Morrison & Foerster LLP San Francisco (415) 268-6024 office (415) 302-6583 mobile (415) 268-7522 fax

\_\_\_\_\_

To ensure compliance with requirements imposed by the IRS, Morrison & Foerster LLP informs you that, if any advice concerning one or more U.S. Federal tax issues is contained in this communication (including any attachments), such advice is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

For information about this legend, go to <u>http://www.mofo.com/Circular230/</u>

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail @mofo.com, and delete the message.

-----

<2011-12-30 Ltr Mazza to Kassabian re CAD.PDF>

To ensure compliance with requirements imposed by the IRS, Morrison & Foerster LLP informs you that, if any advice concerning one or more U.S. Federal tax issues is contained in this communication (including any attachments), such advice is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

For information about this legend, go to http://www.mofo.com/Circular230/

This message contains information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail

@mofo.com, and delete the message.

-----