

EXHIBIT D

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January 3, 2012

Mia Mazza
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425 Market St.
San Francisco, CA 94105-2482

Re: *Apple v. Samsung Electronics, et al.*, No. 5:11-cv-01846-LHK (N.D. Cal.)

Dear Mia:

I am following up on my December 31, 2011 letter requesting that Apple withdraw its objections and produce Rule 30(b)(6) witnesses response to Samsung's First 30(b)(6) Deposition Notice.

Apple has had Samsung's Notice for more than two weeks and refused to provide a single date for deposition. Please produce dates for depositions on the following Topics listed in Samsung's First 30(b)(6) Deposition Notice: 3, 6-8, 11, 21-27, 38-39, 46-50, 60, 63-64, 73, 75-152, 155-159, 162-166, 169-177, 188-199, 202-206, 210-229 no later than tomorrow at midnight. Failure to do so will make this part of the agenda on January 5's lead counsel meet and confer.

Kind regards,

/s/

Diane C. Hutnyan

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