

# EXHIBIT 3

**quinn emanuel trial lawyers | silicon valley**

555 Twin Dolphin Drive, 5th Floor, Redwood Shores, California 94065-2139 | TEL: (650) 801-5000 FAX: (650) 801-5100

WRITER'S INTERNET ADDRESS  
**rachelkassabian@quinnemanuel.com**

December 30, 2011

**VIA ELECTRONIC MAIL**

Mia Mazza  
Morrison & Foerster  
425 Market Street  
San Francisco, CA 94105-2482

Re: Apple Inc. v. Samsung Elecs. Co., Case No. 11-cv-1846 LHK

Dear Mia:

I write in response to your letter dated December 28, 2011 concerning production of additional sketchbooks, CAD, and physical models.

Apple has no basis for requesting documents relating to unaccused products. Samsung, unlike Apple, has been manufacturing "phone products" for nearly thirty years. Yet Apple has not limited its requested to any reasonable time period. Moreover, Apple has not even limited its request to *mobile phones*, much less smartphones—although even this request would be overbroad. As stated, Apple's requests seek CAD files, sketchbooks and physical models relating to *hundreds*, if not thousands, of products that have absolutely nothing to do with Apple's asserted intellectual property or the Samsung accused products—*e.g.*, car phones from 1983, cordless home phones from 1992, and flip phones from 1998. Even if such documents and things were relevant (and of course they are not) the burden imposed on Samsung would be oppressive.

Samsung raised these precise concerns during the last meet and confer call. Apple made no attempt to address them during the call, and thus it is no surprise that you make no attempt to

**quinn emanuel urquhart & sullivan, llp**

LOS ANGELES | 865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL (213) 443-3000 FAX (213) 443-3100  
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TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712  
MANNHEIM | Erzbergerstraße 5, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100  
MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

Mia Mazza  
December 30, 2011

address them in your letter. Instead of meeting and conferring in good faith as to the scope and relevance of Apple's requests, your letter continues Apple's demonstrated strategy of merely repeating its requests, demanding immediate production, and threatening motion practice. We remain available to discuss ways to narrow these requests down to something relevant to this case, if you are so inclined.

Very truly yours,

/s/

Rachel Herrick Kassabian