

EXHIBIT 10
REDACTED VERSION

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December 30, 2011

VIA E-MAIL

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

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

Dear Mia:

I write regarding your letter of December 24, 2011, wherein you describe additional search terms run by Apple on certain Industrial Design inventor documents and specify certain date range cutoffs being applied to documents and things produced from Apple's Industrial Design department.

Additional Search Terms

Your December 24 letter represents that Apple has added, run, and will produce relevant documents responsive to all the search terms proposed for Apple's Industrial Design inventor documents in Marissa Ducca's November 29, 2011 letter, with certain exceptions, for which you proposed revised, delimited terms. Samsung has reviewed its original search term suggestions in light of the proposed delimited terms provided in your December 24 letter and hereby proposes certain revised search terms in the right-hand column of the chart below to address Apple's concerns as to terms that may return a large number of false hits.

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Term Suggested by Samsung	Delimited Term	Samsung's Response
corner or radius	corner within 25 of radius	corner* within 25 of (radi* or sharp or round*)
balanc*	balanc* within 10 of (design or border)	balanc* within 25 of (feel or look or design or border or impression)
thin or light	thin within 10 of light	(thin* or light* or thick*) within 25 of (design or form or factor or profile or phone)
concept	concept within 10 of design	concept within 10 of (design or iPhone or iPad or REDACTED or phone or screen) <i>Specific concepts to search: pond or puddle or oily</i>
target	none — no basis for relevance	target within 25 (audience or customer or user or purchaser)
mask	mask and glass and (tablet or display or screen or edge or perimeter)	mask <i>Please provide examples of false hits if Apple claims this term is overly burdensome</i>
look or feel	look within 10 of feel	<i>Apple's proposed search is sufficient</i>
simpl*	simpl* within 10 of design	simpl* within 10 of (design or form or factor or appearance or impression or phone)
minimal*	minimal* within 10 of design	minimal* within 10 of (design or form or factor or appearance or impression or phone)
Speaker or slot	speaker within 25 of slot	(speaker or "ear piece") within 25 (slot or opening or location or shape)
bezel	bezel and (iPhone or iPad or REDACTED CTEI or phone or screen or glass)	bezel and (iPhone or iPad or REDACTED or phone or screen or glass)
chamfer	chamfer within 25 of (bezel or rim or receiver)	<i>Apple's proposed search is sufficient</i>
button	button within 10 of (home or menu or volume or hold)	button within 10 of (home or menu or locat* or recess* or concave or circ* or quiet or calm or lent*)
tablet	<i>Apple provided no response on this term</i>	tablet

I note that during the November 30, 2011 Meet and Confer, Samsung requested that Apple add the search term "tablet" to its searches. Apple indicated that it would do this for all its hardware

design inventors, so that term has been added to this chart. Additionally, Apple confirmed in that same meeting that Samsung’s proposed searches would be applied to the documents of Steve Jobs. Please confirm that this is being done.

With regard to Samsung’s requested search terms to be added to Apple’s searches of the documents of Messrs. Chaudhri and Anzures, Samsung proposes revised search terms in the right-hand column of the chart below in response to the proposed delimited terms provided in your December 24 letter.

grid	grid within 20 of icon	grid within 20 of (icon* or pattern* or layout or display or align* or line* or springboard or row)
array	array within 20 of icon	array within 20 of (icon* or pattern* or layout or display or align* or line* or grid or springboard or row)
columns	columns within 20 of icon	column* within 20 of (icon* or pattern* or layout or display or align* or line* or grid or springboard or row)
message within 20 of (icon or metaphor)	none — no basis for relevance	message within 20 of (icon or metaphor) <i>These terms are relevant to the text message (or instant message) icon depicted in the patented designs, as well as the trademark for the messaging icon.</i>
dock	dock within 10 of (icon or bottom or row)	dock within 20 of (icon* or bottom or row or phone or homescreen or springboard or place* or arrang* or config* or layout or transparen* or thumb or convenien* or locat*)
status within 5 of bar	none – no basis for relevance	status within 5 of bar <i>These terms are relevant to the status bar at the top of the homescreen, which is depicted in the UI design patents.</i>
springboard	springboard within 10 of (icon or GUI or interface)	springboard within 20 of (phone or iphone or icon* or GUI or UI or interface or design or patent* or grid or column* or look or dock or dots or intuitive or function* or intent* or easy or convenien* or thumb or

		navigate or unique or novel or wada)
target	none — no basis for relevance	target within 25 (audience or user or customer or purchaser)

I note that the use of the asterisk (“*”) in Samsung’s revised searches at the end of word roots is intended to capture all terms containing the specified root. Please confirm that Apple’s searches of terms including an asterisk at the end of the word root sufficiently capture all terms with variable endings to the specified root. For example, a search for “simpl*” should not only capture documents containing the words “simple” and “simply,” but also documents with the word “simplistic.” If this is not the case, please adjust and re-run your searches accordingly to capture such documents. This comment applies to all Samsung’s proposed search terms, including the many Apple has not objected to.

Because the issue of these revised design inventor searches has now been going on for several weeks, including lengthy discussions during several meet and confers, please confirm by January 2, 2012 that Apple will run Samsung’s proposed, revised search terms and produce responsive documents by no later than January 9, 2012. If Apple cannot commit to a substantially complete production of these documents by that date, Samsung will add this item to the lead counsel meet-and-confer agenda.

Date Cutoffs for Review of Design Inventor Documents

Your December 24 letter states that while Apple has applied a lower-range cutoff date of January 1, 2002 for searches of Industrial Design inventor electronic documents, Apple has only collected and scanned Industrial Design sketchbooks dated *on or after January 1, 2003*. The Court's December 22, 2011 order specifying that Apple "shall produce re-scanned inventor sketchbooks with all pages and date references intact on a rolling basis and no later than December 31, 2011" did not contain such a date restriction. Further, Apple provides no reasonable basis for applying different cutoff dates for sketchbooks as opposed to other Industrial Design inventor documents other than to summarily state that Apple has no "belief" that relevant documents are likely to exist in any sketchbooks prior to January 2003. Apple’s unsupported belief on this issue, however, is not a sufficient basis for failing to conduct an adequate search for relevant sketchbook portions, much less to defy a Court order.

Please confirm immediately that Apple's production of design inventor sketchbooks will include at least all those dated on or after January 1, 2002. If we do not receive this written confirmation by January 2, 2012, we will place this issue on the agenda for the lead counsel meet-and-confer.

Regards,

/s/

Scott C. Hall