

EXHIBIT D

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 DIRECT DIAL NO.
(650) 801-5022

November 22, 2011

WRITER'S INTERNET ADDRESS
victoriamaroulis@quinnemanuel.com

VIA E-MAIL

Richard Hung
Morrison & Foerster LLP
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 Rich:

I write regarding Apple's November 9 proposed stipulation adding several Samsung products to the litigation, namely the Galaxy Tab 8.9, Galaxy Tab 7.0, Galaxy Player 4.0, Galaxy Player 5.0, and Galaxy S II Skyrocket. Samsung has considered Apple's proposal and will join the stipulation so long as Apple will stipulate to Samsung's adding the iPhone 4S to the action. Please let us know if Apple will accept this compromise.

On a separate note, please let us know as soon as practicable whether Apple will stipulate to Samsung's serving supplemental invalidity contentions under Patent Local Rule 3-6. On November 10, 2011, Jason Bartlett was sent a letter from Marissa Ducca describing several supplemental invalidity contentions regarding prior art discovered through the recent depositions of Apple's inventors. In particular, Samsung would like to supplement its contentions for the '891, '002, '828, '163, and '129 patents. The letter from Ms. Ducca provides the details of these contentions as well as ample reasons why Apple would not be unduly prejudiced by them.

Sincerely,

/s/ Victoria F. Maroulis

Victoria F. Maroulis

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

NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700

CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401

WASHINGTON, DC | 1101 Pennsylvania Avenue NW, 6th Floor, Washington, District of Columbia 20004-2544 | TEL (202) 756-1950 FAX (202) 756-1951

LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

TOKYO | NBF Hibiya Bldg., 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712