

EXHIBIT L

quinn emanuel trial lawyers | washington, dc

1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004 | TEL: (202) 756-1950 FAX: (202) 756-1951

WRITER'S DIRECT DIAL NO.
(202) 628-9067

WRITER'S INTERNET ADDRESS
marissaducca@quinnemanuel.com

October 24, 2011

VIA ELECTRONIC MAIL

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

Re: *Apple v. Samsung Elecs. Co. et al.*, Case No. 11-cv-1846 LHK (N.D. Cal.)

Dear Mia:

Bas Ording's deposition is scheduled for *tomorrow*, yet Apple has not produced any documents reflecting Mr. Ording's work relating to the '891 patent. This is despite Apple's commitment to providing relevant documents five days before an inventor's deposition, and Samsung's October 18 letter informing Apple of the severe deficiencies in its inventor productions.

Similarly, Steven Christensen's deposition is scheduled for Wednesday. However, Apple has not produced any documents reflecting Mr. Christensen's work on the '002 patent. Apple has also not produced the exhibits attached to Mr. Christensen's deposition of September 27, 2011 in *Apple v. Motorola*. We had previously requested production of these documents during the plenary meet and confer session on Wednesday, October 19.

Please immediately produce documents relevant to Mr. Ording's and Mr. Christensen's depositions **by 5 PM, today, October 24**, or confirm in writing that Apple has no such documents. If Apple believes it has already produced such documents, please immediately indicate their Bates ranges **today**. Given Apple's deficient production, Samsung reserves the right to recall Mr. Ording and Mr. Christensen to the extent that any later produced documents

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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
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CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401
02198.5185/4433264 | 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

are relevant to their testimony.

Best regards,

/s/ Marissa R. Ducca

Marissa R. Ducca

cc: Todd Briggs
Alan Whitehurst
Sara Jenkins

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