

# EXHIBIT B

November 1, 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:

Although I will address many documents identified throughout the inventor depositions that Apple failed to produce in a later letter, I am writing regarding several specific document production issues from the '002 and '891 patent depositions.

**The '891 Patent**

During the depositions of the '891 inventors, we discovered that Mac OS 10.0, released before the priority date of the '891 patent, is prior art. Please produce (1) the source code for Mac OS 10.0 and (2) a computer with a functional copy of Mac OS 10.0 installed on it. The Mac OS 10.0 source code and computer with software is responsive to at least the following Requests for Production, served on Apple on August 3, 2011:

96. All prior art to the APPLE IP identified at any time to Apple as potentially or allegedly invalidating prior art to the APPLE IP.
98. All documents and things relating to any information, including patents, publications, prior knowledge, public uses, sales, or offers for sale, that may constitute, contain, disclose, refer to, relate to, or embody any prior art to any

**quinn emanuel urquhart & sullivan, llp**

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alleged invention claimed by the Apple IP.

Please produce this source code and computer immediately.

**The '002 Patent**

First, during his deposition, Mr. Christensen testified regarding a heavily redacted document that was marked as Exhibit 979 (Bates Nos. APLNDC-X0000002308-2312). This document is not privileged, and should be produced in its entirety. Please produce an unredacted version of the document marked as Exhibit 979 immediately. Counsel requested this document in its unredacted form at that deposition. *See* Christensen Dep. at 63:9-11.

Second, during his deposition, Mr. Christensen testified regarding Super Clock, and we requested the source code for this application. *See* Christensen Dep. at 184:1-2. The Super Clock source code is at least responsive to Requests for Production 96 and 98 reproduced above. Please produce the Super Clock source code immediately.

I look forward to your response.

Best regards,

*/s/ Marissa R. Ducca*

Marissa R. Ducca

cc: Todd Briggs  
Alan Whitehurst  
Vicki Maroulis  
Rachel Herrick Kassabian

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