

EXHIBIT 2

Pat King

From: Rachel Herrick Kassabian
Sent: Friday, January 27, 2012 8:34 PM
To: Mazza, Mia
Cc: AppleMoFo; Samsung v. Apple; Sam.Maselli@wilmerhale.com; calvin.walden@wilmerhale.com; peter.kolovos@wilmerhale.com
Subject: RE: Apple v. Samsung - Motion to Shorten Time

Hi Mia,

While I disagree with your characterization below, I will nevertheless endeavor to see if we can agree to a shortened schedule, given the nature of the issue. Given that you have been sitting on this issue since January 16, it is not reasonable for you to email me about this after the close of business on a Friday night and expect an immediate response. I will confer with our team and attempt to reach my client, but as you know, it is Saturday in Korea. I will get you an answer tomorrow.

Regards,

Rachel M Kassabian
Quinn Emanuel LLP

Sent from my Samsung Epic™ 4G

"Mazza, Mia" wrote:

[My apologies, I meant January 31, not December 31. Text below is adjusted.](#)

From: Mazza, Mia
Sent: Friday, January 27, 2012 8:08 PM
To: 'Rachel Herrick Kassabian'
Cc: AppleMoFo; Samsung v. Apple; 'Sam.Maselli@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'
Subject: RE: Apple v. Samsung - Motion to Shorten Time

Rachel --

In the attached letter setting forth Apple's agenda for the parties' January 16, 2012, lead trial counsel meet and confer, Apple advised that it would be seeking an order requiring Samsung to produce foreign-language documents 10 days in advance of each custodian's deposition. Apple set forth the basis for its motion, and responded in detail to a letter received from you earlier in the day providing Samsung's purported reasons for its recent tardy productions of foreign-language documents.

At the lead trial counsel meeting on January 16, 2012, Harold McElhinny asked Charles Verhoeven whether Samsung would agree to produce Korean-language documents 10 days in advance of each custodian's deposition. Mr. Verhoeven stated that Samsung would not agree to such a rule. The lead trial counsel meet-and-confer requirement has been satisfied.

Our motion to shorten time seeks a hearing on February 1, 2012, at 10:00 a.m. It anticipates an opposition brief being filed on January 31, 2012, at noon.

Please let me know within the hour if Samsung agrees to stipulate to this schedule, or would like to propose an alternative expedited schedule with a hearing no later than February 1, 2012.

If I don't hear from you on that point, we will assume that Samsung does not agree to such a stipulation.

Regards,

Mia Mazza
Morrison & Foerster LLP
San Francisco
(415) 268-6024 office
(415) 302-6583 mobile
(415) 268-7522 fax

-----Original Message-----

From: Rachel Herrick Kassabian [<mailto:rachelkassabian@quinnemanuel.com>]
Sent: Friday, January 27, 2012 7:45 PM
To: Mazza, Mia; AppleMoFo; Samsung v. Apple; 'Sam.Maselli@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'
Subject: RE: Apple v. Samsung - Motion to Shorten Time

Hi Mia,

Can you please answer my questions, so we have some idea of what you are talking about and can respond to your request below? I would appreciate that.

Thanks,
Rachel

-----Original Message-----

From: Mazza, Mia [<mailto:MMazza@mofo.com>]
Sent: Friday, January 27, 2012 7:29 PM
To: Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Sam.Maselli@wilmerhale.com; calvin.walden@wilmerhale.com; peter.kolovos@wilmerhale.com
Subject: Re: Apple v. Samsung - Motion to Shorten Time

I will take your response to mean that Samsung objects to Apple's motion being heard on shortened time. Please let me know right away if that is not the case.

Mia Mazza
Morrison & Foerster LLP
425 Market Street
San Francisco, CA 94110
(415) 268-6024 (office)
(415) 216-5835 (mobile)
(415) 268-7522 (facsimile)
mmazza@mofo.com

----- Original Message -----

From: Rachel Herrick Kassabian [<mailto:rachelkassabian@quinnemanuel.com>]

Sent: Friday, January 27, 2012 07:14 PM

To: Mazza, Mia; AppleMoFo; Samsung v. Apple <Samsungv.Apple@quinnemanuel.com>; 'Sam.Maselli@wilmerhale.com' <Sam.Maselli@wilmerhale.com>; 'calvin.walden@wilmerhale.com' <calvin.walden@wilmerhale.com>; 'peter.kolovos@wilmerhale.com' <peter.kolovos@wilmerhale.com>
Subject: RE: Apple v. Samsung - Motion to Shorten Time

Hi Mia,

Do you mean to say that you are seeking reconsideration of Judge Grewal's two prior orders permitting the parties to produce documents up to 3 days in advance of a given deposition? If that is not what Apple is seeking, please explain.

In any event, I do not believe Apple has completed the meet and confer process on this issue. As I recall, after you first wrote us on this issue, we sent you a responsive letter indicating that we were amenable to some sort of an agreement to produce documents on some lengthier timetable than the court-ordered 3 days. I do not think Apple ever responded to my letter. Did you? If not, please respond immediately.

As always, we remain hopeful that the parties can work things out with court intervention if they engage in earnest and meaningful meet and confer negotiations. Sending a letter and then filing a motion doesn't cut it. We certainly hope Apple does not intend to proceed in that fashion.

Regards,

Rachel

-----Original Message-----

From: Mazza, Mia [<mailto:MMazza@mofo.com>]

Sent: Friday, January 27, 2012 7:05 PM

To: Rachel Herrick Kassabian; AppleMoFo; Samsung v. Apple; Sam.Maselli@wilmerhale.com; calvin.walden@wilmerhale.com; peter.kolovos@wilmerhale.com
Subject: Apple v. Samsung - Motion to Shorten Time

Hi Rachel,

Tonight Apple will be filing a motion to compel Samsung to timely produce documents in advance of depositions, as discussed in the parties' last lead counsel meeting.

We are moving to shorten time for the hearing of this motion. Please let me know by 8 pm if Samsung consents to the motion being heard on shortened time. Otherwise we will assume Samsung objects.

Regards,

MM

Mia Mazza
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