

EXHIBIT B

December 27, 2011

Writer's Direct Contact
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Via E-Mail (melissachan@quinnemanuel.com)

Melissa N. Chan
Quinn Emanuel
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065

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

Dear Melissa:

I write regarding Samsung's December 13, 2011, disclosure of Samuel Lucente as an expert in this case. We did not receive responses to Matthew Ahn's email requests on December 19 and 20 to discuss Mr. Lucente's disclosure, and so there are still questions that must be answered before Apple has sufficient information to evaluate whether or not Mr. Lucente has a conflict that should bar him from viewing Apple's confidential information. Until Samsung is willing to discuss Mr. Lucente's disclosure, Apple objects to the disclosure of its confidential information to Mr. Lucente.

To expedite the completion of Apple's review process, please let us know as soon as possible whether Mr. Lucente has ever participated in, or consulted on, developing or designing a mobile phone. In addition, please provide us with a list of clients of Lucente Design.

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: Samuel Maselli
S. Calvin Walden
Peter Kolovos