

EXHIBIT E

Brett Arnold

From: Rachel Herrick Kassabian
Sent: Monday, January 16, 2012 11:21 AM
To: 'Mazza, Mia'
Cc: 'AppleMoFo'; Samsung v. Apple; 'Samuel.Maselli@wilmerhale.com'; 'peter.kolovos@wilmerhale.com'; 'calvin.walden@wilmerhale.com'; 'Mark.Selwyn@wilmerhale.com'
Subject: RE: Apple v. Samsung: Discovery Correspondence - Monday's Lead Trial Counsel Meeting
Attachments: 2012-01-07 Hutnyan re Apple's Improper Objections to RFAs.pdf

Hi Mia,

You already know our position regarding your January 13, 10PM letter.

As for Samsung's agenda, please be prepared to close the loop on Apple's objections to Samsung's expert Lucente (discussed but not resolved at the last LCM&C), and Apple's deficient responses to Samsung's 2nd Set of RFAs, which Apple has refused to amend.

Regards,
Rachel

From: Mazza, Mia [mailto:MMazza@mofo.com]
Sent: Monday, January 16, 2012 9:30 AM
To: Rachel Herrick Kassabian
Cc: AppleMoFo; Samsung v. Apple; Samuel.Maselli@wilmerhale.com; peter.kolovos@wilmerhale.com; calvin.walden@wilmerhale.com; Mark.Selwyn@wilmerhale.com
Subject: Re: Apple v. Samsung: Discovery Correspondence - Monday's Lead Trial Counsel Meeting

Rachel --

Harold, Mark Selwyn, and I will be in attendance today. Calvin will participate by phone -- please circulate a dial-in (or we can, if you prefer).

This goes without saying, but to be clear -- we intend to, and are coming prepared to, meet and confer regarding all of Apple's agenda items set forth in my January 13 letter, and we expect Samsung to do so as well.

Regards,

MM

Mia Mazza
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From: Rachel Herrick Kassabian [mailto:rachelkassabian@quinnemanuel.com]
Sent: Sunday, January 15, 2012 10:33 AM
To: Mazza, Mia
Cc: AppleMoFo; Samsung v. Apple <Samsungv.Apple@quinnemanuel.com>; 'Maselli, Samuel' <Samuel.Maselli@wilmerhale.com>; 'Kolovos, Peter' <Peter.Kolovos@wilmerhale.com>; 'Walden, S. Calvin' <Calvin.Walden@wilmerhale.com>
Subject: RE: Apple v. Samsung: Discovery Correspondence - Monday's Lead Trial Counsel Meeting

Mia,

I have received your letter sent Friday night 1/13 after 10pm. As to whether the issues presented in your letter will be addressed at Monday's in person meet and confer, please see my responses to each of your items below. We will respond substantively to your letter in later correspondence.

1. Production of documents in advance of depositions of Samsung witnesses.

On Monday's lead counsel meet and confer, we will discuss whether the parties will agree on a reciprocal basis to produce documents on a deadline shorter than the 3-day rule previously ordered by the Court.

2. Proposed stipulation regarding deposition conduct.

We will discuss this at Monday's lead counsel meet and confer.

3. Return of Woogyun Kho after Winset documents are produced.

This is a new issue, raised for the first time this weekend (36 hours ago). We will investigate it and respond in writing in due course.

4. Apple's First 30(b)(6) notice (license topics).

This is a new issue, raised for the first time last week. We have not yet had an opportunity to confer with our client about it. We will investigate it and respond in writing in due course.

5. Apple's Second 30(b)(6) notice ('055 and '871 patents).

This is a new issue, raised for the first time last week. We have not yet had an opportunity to confer with our client about it. We will investigate it and respond in writing in due course.

6. Production of documents from Hye-Young Lee and Pyung-soo Kim ('055 and '871).

Apple has already filed a motion to compel on this issue – just last week, in fact. Please confer with your team if you are unaware of this.

7. Samsung's RFA responses.

This is a new issue, raised for the first time last Friday (48 hours ago). We have not yet had an opportunity to confer with our client about it. We will investigate it and respond in writing in due course.

8. Follow-up on various Samsung RFP responses.

This is a new issue, raised for the first time this weekend (36 hours ago). We have not yet had an opportunity to confer with our client about it. We will investigate it and respond in writing in due course.

Regards,
Rachel

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

Sent: Friday, January 13, 2012 10:02 PM

To: Rachel Herrick Kassabian

Cc: AppleMoFo; Samsung v. Apple; Maselli, Samuel; Kolovos, Peter; Walden, S. Calvin

Subject: Apple v. Samsung; Discovery Correspondence - Monday's Lead Trial Counsel Meeting

<<2012-01-13 Ltr Mazza to Kassabian re Agenda for LTCM&C.pdf>>

Hi Rachel,

Attached please find Apple's agenda for this Monday's in-person meeting between Charles Verhoeven and Harold McElhinny. I would appreciate it if you would please let me know as soon as possible what time that meeting will occur.

Regards,

Mia Mazza

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