

Exhibit D

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December 5, 2011

VIA ELECTRONIC MAIL

Sam Maselli
Wilmer Hale
950 Page Mill Road
Palo Alto, California 94304

Re: Apple Inc. v. Samsung Elecs. Co. Ltd. et al., Case No. 11-cv-01846-LHK (N.D. Cal.)

Dear Sam:

I am writing in response to your November 30 letter regarding a reciprocal stipulation to add products to the Northern District of California action.

Your question is unclear. Under the local patent rules of this district, Samsung believes that the contentions under Local P.R. 3-1 need to be amended for each added product. For example, for some patents, new claim charts will be required to set forth Samsung's infringement contentions, and for other patents the claim charts served on September 7 may be representative of the iPhone 4s.

Your letter also raises questions about Apple's proposed added products. Is Apple planning to serve amended contentions, or is Apple planning to proceed under its previously served theories? Please either respond in writing or be prepared to discuss on the parties' weekly meet and confer session on Wednesday.

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Best regards,

/s/ Victoria F. Maroulis

Victoria F. Maroulis