

EXHIBIT 3

From: Ahn, Deok Keun Matthew
Sent: Tuesday, December 20, 2011 4:48 PM
To: 'Alex Binder'; 'Melissa Chan'; 'SaraJenkins@quinnemanuel.com'; Victoria Maroulis; Margret Caruso; Todd Briggs; Rachel Herrick Kassabian
Cc: Mazza, Mia
Subject: RE: Apple Inc. v. Samsung Electronics Co., Ltd. et al.: Discovery Counsel,

The original message below requests a departure from the procedures in the protective order in this case. If someone on your team is available to discuss this request, please call me.

best regards,

Matt

Deok Keun Matthew Ahn | Morrison & Foerster LLP
425 Market Street, San Francisco, California 94105
dahn@mfo.com | tel: 415.268.6629 | fax: 415.276.7263

From: Ahn, Deok Keun Matthew
Sent: Tuesday, December 20, 2011 11:48 AM
To: 'Alex Binder'; 'Melissa Chan'; 'SaraJenkins@quinnemanuel.com'
Cc: Mazza, Mia
Subject: RE: Apple Inc. v. Samsung Electronics Co., Ltd. et al.: Discovery

Melissa or Sara,

I haven't been able to get a hold of Alex about this. Can one of you call me today?

thanks,

Matt

Deok Keun Matthew Ahn | Morrison & Foerster LLP
425 Market Street, San Francisco, California 94105
dahn@mfo.com | tel: 415.268.6629 | fax: 415.276.7263

From: Ahn, Deok Keun Matthew
Sent: Monday, December 19, 2011 8:39 PM
To: 'Alex Binder'
Subject: RE: Apple Inc. v. Samsung Electronics Co., Ltd. et al.: Discovery

Alex,

Please call me at 415-268-6629 regarding your email.

thanks,

Matt

Deok Keun Matthew Ahn | Morrison & Foerster LLP

425 Market Street, San Francisco, California 94105

dahn@mofo.com | tel: 415.268.6629 | fax: 415.276.7263

From: Alex Binder [mailto:alexbinder@quinnemanuel.com]

Sent: Tuesday, December 13, 2011 5:46 PM

To: AppleMoFo; WHAppleSamsungNDCalService@wilmerhale.com; Ahn, Deok Keun Matthew; Tucher, Alison M.; Jacobs, Michael A.; McElhinny, Harold J.; Bartlett, Jason R.; mark.selwyn@wilmerhale.com; william.lee@wilmerhale.com

Cc: Victoria Maroulis; Margret Caruso; Todd Briggs; Rachel Herrick Kassabian

Subject: Apple Inc. v. Samsung Electronics Co., Ltd. et al.: Discovery

Counsel,

Samsung hereby discloses Samuel Lucente as an expert in this case. Attached are Mr. Lucentés curriculum vitae, which includes his current employer and each entity from which he has received compensation in his area of expertise over the last 5 years, and Mr. Lucente's signed undertaking of the Interim Model Protective Order. Please note that Mr. Lucente does not have any previous litigation history.

Please let us know by December 20, 2011 whether Apple objects, and the grounds for such objection, to disclosure to Mr. Lucente of Apple information designated in this litigation as "Highly Confidential – Attorney's Eyes Only," and "Highly Confidential – Source Code" under the Interim Model Protective Order.

Alex Binder

Associate,

Quinn Emanuel Urquhart & Sullivan, LLP

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