

# EXHIBIT 1

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March 1, 2012

**VIA ELECTRONIC MAIL**

Jason Bartlett  
Morrison & Foerster, LLP  
425 Market Street  
San Francisco, California 94105

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

Dear Jason:

With the close of discovery less than seven days away, Apple's refusal to confirm and/or propose deposition dates for over 20 Apple witnesses has substantially impaired Samsung's discovery efforts and trial preparations. Because of this obstructionism, Apple has left insufficient time to schedule, much less prepare for, the outstanding depositions of Apple witnesses.

The deposition of Zack Kamen is scheduled for tomorrow, March 2, 2012. Because Apple has refused to produce Mr. Kamen for this deposition, Samsung has no choice but to cancel the videographer and court reporter and move to compel.

Apple has also refused to make other witnesses available on dates that it proposed, and Samsung accepted, weeks ago. If Apple does not confirm that these depositions will proceed on the dates the parties previously confirmed by 5:30 p.m., today, March 1, Samsung will understand Apple's failure to confirm as a refusal to make the witnesses available for deposition and move to compel:

Chris Hood (deposition confirmed for 3/6)

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Fred Simon (deposition confirmed for 3/7)

Apple has also refused to propose any dates for the depositions of several other properly noticed depositions, contrary to the parties' agreement that dates would be provided regardless of any objections to the depositions. Immediately provide dates for the following Apple witnesses:

Chris Birgers

John Brown

Tim Cook

Eddy Cue

David Falkenburg

John Geleynse

Deborah Goldsmith

Saku Hieta

Jason Huey

Eugene Kim

Noreen Krall

Henri Lamiroux

Michael Lee

Michael Lewis

Jeff Robbin

Justin Santamaria

Kristi Schmidt

Bruce Sewell

Steven Sinclair

Michael Solomon

Rebecca Van Dyck

Jeff Williams

David Zhang

If Apple does not propose dates for these witnesses by 12:00 p.m., March 2, 2012, Samsung will conclude that Apple has refused to produce the witnesses and put this issue on the agenda for the next lead counsel meet and confer in anticipation of a motion to compel.

Kind regards,

*/s/ Diane C. Hutnyan*

Diane C. Hutnyan

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