

EXHIBIT 11

January 2, 2012

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Via E-Mail (melissachan@quinnemanuel.com)

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

Dear Melissa:

We write as a follow-up to our November 9, November 28, and December 6, 2011, letters, your December 2, 2011, letter, and the Court's December 22, 2011, Order, regarding Samsung's production of source code and other relevant technical documents.

Our November 9 and November 28, 2011, letters outlined a list of source code and other technical documents requested by Apple and identified them as responsive to Apple's RFP Nos. 11-12 and 223-250 and its PI RFP Nos. 200-203. On December 6, 2011, I sent a letter identifying a narrowed subset of source code and technical documentation that Apple would accept on an expedited basis. Apple then moved to compel production of that subset of documents.

As part of Samsung's opposition to Apple's motion to compel, Samsung noted that its responses to Apple's RFPs 223-250 had just been provided on November 30 and argued that the parties had not yet met and conferred regarding those requests.

The Court's December 22 Order granted Apple's motion with respect to "source code and technical documents requested by Apple's motion," requiring Samsung to produce them by December 31, 2011. With respect to "technical documents" requested in RFP Nos. 193, 226-29, 230-35, 240, and 243-45, the Court denied Apple's motion without prejudice to Apple's re-raising the issues after additional meet-and-confer.

A. Categories of Source Code and Related Technical Documents Samsung Was Required to Produce by December 31, 2011 under the December 22 Order

To avoid confusion or unnecessary further disputes, Apple expects Samsung to have produced by December 31 at least the following categories of source code and related technical documents under the December 22 Order, as outlined in Apple's Proposed Order:

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1. Source code and necessary configuration files in any Samsung product at issue relating to the display and operation of a user interface status bar or a notification in a status bar.
2. Source code and necessary configuration files in any Samsung product at issue relating to the “rubber-banding” functionality, which allows for an image, list, webpage or document to be scrolled beyond its edge until it is partially displayed, then allows for that document to scroll or bounce back into place. This includes any source code related to the “android.widget.OverScroller” class included in Android API Level 9, as well as equivalent source code or instructions in other versions of Android implemented onto the Samsung Products at Issue.
3. Source code and necessary configuration files in any Samsung product at issue relating to pop-up windows, including the timed display thereof.
4. Source code and necessary configuration files in any Samsung product at issue relating to scrolling and scaling.
5. Source code and necessary configuration files in any Samsung product at issue relating to scroll lock
6. Source code and necessary configuration files for the following software: TouchWiz, Browser, Camera, Contacts, Gallery, PDF Viewer, ThinkFree Mobile Office, Memo, and Maps applications, at least to the extent that the source code for these applications calls or is called by code included in Paragraphs 1 through 5 and 7 through 10.
7. Touch screen-related source code and documents, including: (i) source code and necessary configuration files for the touch sensor controllers in any Samsung product at issue; and (ii) documents sufficient to show and to understand design, specifications and manufacturing tolerances for the touch screens, touch sensor controllers, and touch screen components in the Samsung Products at Issue, including but not limited to specifications, schematics, flow charts, formulas, or other documentation showing the design and operation of the touch screens, touch sensor controllers, and touch screen components or of other accused features.
8. Source code and necessary configuration files in any Samsung product at issue relating to the generation or display of windows (or views), including code called by application programs to control windows (or views) or what they display.

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9. Source code and necessary configuration files in any Samsung product at issue relating to interprocess communication, including code for generating, registering for, listening for, or otherwise processing messages or events.
10. Source code and necessary configuration files in any Samsung product at issue relating to processing, at any level of the software stack, single- or multi-point touch screen contacts, including code that detects, interprets (*e.g.*, by interpreting as a gesture), or distinguishes between tapping, dragging, flicking/flinging, pinching/depinching, rotation, or other touch screen contacts.
11. The above 10 categories of source code should be organized according to, among other things, Android version. If any of the source code above includes or uses any libraries, database systems, or similar files, Samsung shall produce those documents and information regarding their configuration and use.

Apple acknowledges that there may be certain “technical documents” within these categories for which production may be deferred pending further meet and confer, as outlined in Section B below. All source code, however, and all related technical documents *not* listed in Section B, were required to be produced on December 31, 2011.

B. Categories of Technical Documents Requiring Further Meet and Confer

Footnote 2 of the December 22 Order requires the parties to meet and confer further regarding Samsung’s production of the following technical documents:

- Documents showing, for each Product at Issue, the evolution and version history of the operating system (including but not limited to the Android operating system and/or platform) used in that Product at Issue, including, but not limited to, the dates during which each version of operating system was used. (RFP No. 225.)
- Documents identifying, for each Product at Issue, any updates to the operating system (including, but not limited to, the Android operating system and/or platform) used in the Product at Issue, including, but not limited to, the date(s) when such updates were made available. (RFP No. 226.)
- Documents referring or relating to the features, operations, characteristics of, or changes made to each version of the operating system (including, but not limited to, the Android operating system and/or platform) used in each Product at Issue, including technical specifications as well as instructions relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 227.)

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- Documents showing, for each Product at Issue, the evolution and version history of any software, firmware, program(s), library(ies) or other system used to control the touch screens (including the display and touch sensor panels) of the Products at Issue, including but not limited to the dates during which each version was in use. (RFP No. 299.)
- Documents identifying, for each Product at Issue, any update to any software, firmware, program(s), library(ies) or other system used to control the touch screens (including the display and touch sensor panels) of the Products at Issue, including, but not limited to, the date(s) when such updates were made available. (RFP No. 230)
- Documents referring or relating to the features, operations, characteristics of, or changes made to each version of the any software, firmware, program(s), library(ies) or other system used to control the touch screens (including the display and touch sensor panels) of the Products at Issue, including technical specifications as well as instructions relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 231.)
- Documents showing, for each Product at Issue, the evolution and version history of each Samsung application installed in the Products at Issue, including but not limited to the dates during which each version of each application was installed, and the identity of each product in which the application was installed. (RFP No. 233.)
- Documents identifying, for each Product at Issue, any updates to each Samsung application installed in the Products at Issue, including, but not limited to, the date(s) when such updates were made available. (RFP No. 234.)
- Documents referring or relating to the features, operations, characteristics of, or changes made to each version of any Samsung application installed in the Products at Issue, including, but not limited to, those relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 235.)
- Documents concerning the design, manufacture, specifications and operation of the touch screens (including the display and touch sensor panels) on the Products at Issue. (RFP No. 240.)
- Documents showing the arrangement and specification of traces, conductive lines, conductive layers, glass, dielectrics, substrates, adhesives, and other elements used to construct the touch screens (including the display and touch sensor panels) of the Products at Issue. (RFP No. 243.)

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- Documents concerning the design, manufacture, specification and operation of any monitoring circuitry, integrated circuit, chip, controller or module used to operate the touch screens (including the display and touch sensor panels) of the Products at Issue. (RFP No. 244.)
- Data sheets concerning the touch screens (including the display and touch sensor panels) on the Products at Issue or any monitoring circuitry, integrated circuit, chip, controller or module used to operate said touch screens. (RFP No. 245.)

Apple requests that Samsung agree to substantially complete its production of technical documents in these 13 additional categories by **January 23, 2012**, and requests that Samsung agree to participate in a working meet-and-confer call on Wednesday, January 4, 2012, to discuss Samsung's willingness to produce this scope of documents on that time frame. If the parties cannot reach a mutually satisfactory resolution on Wednesday, then this issue will be placed on the agenda for the January 5, 2012, lead counsel meet and confer call.

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: Samuel Maselli
S. Calvin Walden
Peter Kolovos