

EXHIBIT 13

January 5, 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 in response to your January 3, 2012, letter regarding Samsung's production of technical documents. (Issues related to source code were addressed in a separate letter sent earlier this evening.)

In your January 3 letter, Samsung states that Apple "must explain its asserted need for documents showing the "evolution" of the entire operating system, every aspect of Samsung's touchscreens, and each application installed on the accused products." Samsung further states that Apple "must explain the relevance of updates made to product features that are not accused in this action and/or updates initiated by parties other than Samsung." Finally, Samsung's letter states that "Apple's requests for all documents 'referring or relating to' any 'feature' or 'characteristic' of the operating systems, touchscreens, and installed applications are patently overbroad on their face."

In an effort to expedite the production of these technical documents, which Apple needs urgently to prepare for upcoming depositions, for the time being Apple is willing to narrow its current requests for technical documents as follows. This is without prejudice to Apple's ability to make additional requests, depending on the sufficiency of Samsung's actual production:

Request for Production	Proposed narrowed request
All 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	Documents sufficient to show, for each Product at Issue, which versions of the operating system (including but not limited to the Android operating system or TouchWiz overlay) included the accused functionality, and the dates during which

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Request for Production	Proposed narrowed request
during which each version of operating system was used. (RFP No. 225.)	each version of the operating system was used. (RFP No. 225.)
All 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 sufficient to show, for each Product at Issue, which updates to the operating system (including but not limited to the Android operating system or TouchWiz overlay) included the accused functionality, and the dates when such updates were made available. (RFP No. 226.)
All 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.)	Documents sufficient to show, for each Product at Issue, which features, operations, characteristics of, or changes made to each version of the operating system (including, but not limited to, the Android operating system or TouchWiz overlay) included the accused functionality, including technical specifications as well as instructions relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 227.)
All 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 at least the touch sensor panels) of the Products at Issue, including but not limited to the dates during which each version was in use. (RFP No. 229.)	Documents sufficient to show, for each Product at Issue, which versions of any software, firmware, program(s) library(ies) or other system used to control the touchscreens (including at least the touch sensor panels) included the accused functionality, and the dates during which each such version was in use. (RFP No. 229.)
All 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	Documents sufficient to show, for each Product at Issue, which updates to any software, firmware, program(s), library(ies) or other system used to control the touch screens (including at least the touch sensor panels) included the accused functionality, and the dates when such updates were made

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Request for Production	Proposed narrowed request
updates were made available. (RFP No. 230)	available. (RFP No. 230.)
All 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 sufficient to show, for each Product at Issue, which 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) included the accused functionality, including technical specifications as well as instructions relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 231.)
All 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 sufficient to show, for each Product at Issue, which versions of each Samsung application installed in the Products at Issue included the accused functionality, and the dates during which each such version was in use. (RFP No. 233.)
All 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 sufficient to show, for each Product at Issue, which updates to each Samsung application included the accused functionality, and the dates when such updates were made available. (RFP No. 234.)
All 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 sufficient to show, for each Product at Issue, which features, operations, characteristics of, or changes made to each version of any Samsung application of the Products at Issue included the accused functionality, including, but not limited to, those relating to deployment, installation, maintenance, and upgrade procedures. (RFP No. 235.)
All Documents showing the arrangement and	Documents sufficient to show the

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Request for Production	Proposed narrowed request
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.)	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.)
All 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.)	Documents sufficient to show 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.)
All 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.)	All 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 (unchanged).)

Apple proposes that Samsung satisfy Request for Production No. 240 by producing the following:

- 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.
- All requests for quotations relating to the touchscreens, touchscreen controllers, and touch screen components in each Samsung Product at Issue.
- All qualification documentation for the touchscreens, touchscreen controllers, and touch screen components in each Samsung Product at Issue, including internal qualification documentation and vendor qualification documentation, specifications

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used to qualify both first- and third-party supplied parts and components, and quality control criteria used for manufacturing.

- All Bills of Materials and design drawings relating to the Samsung Products at Issue provided to or received from vendors or suppliers.
- All functional testing results and testing criteria relating to the touch screens, touch sensor controllers, and touch screen components in the Samsung Products at Issue, including documents pertaining to prototypes and pre-production touch screens, touch sensor controllers, and touch screen components.
- All testing data related to the shielding of traces of conductive material in the Samsung Products at Issue.
- Specifications, schematics, flow charts, artwork, 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.

Should Samsung believe that any of these categories of documents – particularly those requesting documents “sufficient to show” – are burdensome, Apple is willing to consider stipulations to minimize the alleged burden (*e.g.*, that all versions of certain software worked identically with respect to the accused functionality).

We look forward to discussing this narrowed scope of production of technical documents with you at Thursday’s lead counsel meeting.

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: Samuel Maselli
S. Calvin Walden
Peter Kolovos