

# EXHIBIT C

**Barajas, Rosemary**

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**From:** Pernick, Marc J.  
**Sent:** Friday, March 09, 2012 2:33 AM  
**To:** 'Jon Steiger'; Anthony Alden; Mazza, Mia  
**Cc:** AppleMoFo; Samsung v. Apple; 'WHAppleSamsungNDCalService@wilmerhale.com'  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Hi Jon:

Samsung is in no position to be impatient here. Erik Olson just got through customs in Seoul, and I have now updated him with respect to Samsung's latest production of documents that violates the Court's order.

Mr. Sim should appear tomorrow morning at 9:00 a.m. Mr. Olson will hopefully by then have had time to review Samsung's untimely production. Mr. Olson will be in the office at 9:00 a.m. too, and he will inform Samsung then about how we are going to proceed.

Needless to say, Apple reserves all of its rights regarding this deposition.

Marc Pernick

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**From:** Jon Steiger [mailto:jonsteiger@quinnemanuel.com]  
**Sent:** Friday, March 09, 2012 2:05 AM  
**To:** Pernick, Marc J.; Anthony Alden; Mazza, Mia  
**Cc:** AppleMoFo; Samsung v. Apple; 'WHAppleSamsungNDCalService@wilmerhale.com'  
**Subject:** Re: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Marc,

I believe any planes have landed by now. We need to decide now what date you prefer. We are fine either way, and ready to proceed tomorrow. Vice President Sim cannot appear both Saturday and Tuesday, however, as he must reallocate other work to one day or the other. If we do not hear from you in the next half hour, we will assume you would prefer to go ahead tomorrow rather than Tuesday 3/13, and we will appear at the deposition location at 9 am. If he appears tomorrow, Mr. Sim cannot then appear again on 3/13. Please let us know your preference, thanks.

Jon

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**From:** Pernick, Marc J. [mailto:MPernick@mofo.com]  
**Sent:** Thursday, March 08, 2012 09:54 PM  
**To:** Anthony Alden; Mazza, Mia <MMazza@mofo.com>  
**Cc:** AppleMoFo <AppleMoFo@mofo.com>; Samsung v. Apple; WH Apple Samsung NDCal Service <WHAppleSamsungNDCalService@wilmerhale.com>  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Anthony:

The lawyer taking the Sim deposition is in the air en route to Korea. He was already in the air when we received your message a few hours ago.

I will let you know about how we want to proceed once I hear from him.

Marc

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**From:** Anthony Alden [mailto:anthonyalden@quinnemanuel.com]  
**Sent:** Thursday, March 08, 2012 9:53 PM  
**To:** Mazza, Mia  
**Cc:** AppleMoFo; Samsung v. Apple; WH Apple Samsung NDCal Service; Anthony Alden  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Marc: we intend to produce another approximately 14,000 pages within the next couple of hours. Can you please let me know immediately whether Apple intends to proceed with Mr. Sim's deposition tomorrow or March 13? We don't mind either way, but I need to let the witness know now one way or the other.

**Anthony Alden**  
*Partner*  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
213-443-3159 Direct  
213-443-3000 Main Office Number  
213-443-3100 Fax  
anthonyalden@quinnemanuel.com  
[www.quinnemanuel.com](http://www.quinnemanuel.com)

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**From:** Anthony Alden  
**Sent:** Thursday, March 08, 2012 5:38 PM  
**To:** Mazza, Mia  
**Cc:** AppleMoFo; Samsung v. Apple; WH Apple Samsung NDCal Service; Anthony Alden  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Marc: in further response to your letter of March 6, 2012, Samsung designates Mr. Sim to testify as to the following topics in Apple's Seventh Rule 30(b)(6) notice, subject to its objections: 1-6, 16, 17, 20, 22, 26-30. These topics largely overlap with the topics for which Mr. Sim has already been designated. In addition, Samsung expects to produce additional documents tonight that may be relevant to Mr. Shim's deposition.

Under these circumstances, Samsung is willing to postpone Mr. Shim's deposition until March 13, 2012, to allow Apple more time to prepare. Mr. Shim could stay relatively late on March 13 to ensure the deposition is completed.

Please let me know how Apple would like to proceed as soon as possible.

Thanks,

Anthony P. Alden | Partner | **quinn emanuel urquhart & sullivan, llp** | 865 S. Figueroa Street, 10th Floor | Los Angeles, CA 90017 | 213-443-3159 Direct | 213-443-3000 Main Office Number | 213-443-3100 Fax  
| [anthonyalden@quinnemanuel.com](mailto:anthonyalden@quinnemanuel.com) | [www.quinnemanuel.com](http://www.quinnemanuel.com)

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**From:** Anthony Alden  
**Sent:** Wednesday, March 07, 2012 11:15 PM  
**To:** Mazza, Mia  
**Cc:** AppleMoFo; Samsung v. Apple; WH Apple Samsung NDCal Service  
**Subject:** RE: Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

Marc: without taking the time to respond to the substantive inaccuracies in your letter, Mr. Sim will start his deposition at 9:00 a.m. on March 10, but can be available until 8:00 p.m., if necessary.

Thanks,

Anthony P. Alden | Partner | **quinn emanuel urquhart & sullivan, llp** | 865 S. Figueroa Street, 10th Floor | Los Angeles, CA 90017 | 213-443-3159 Direct | 213-443-3000 Main Office Number | 213-443-3100 Fax  
| [anthonyalden@quinnemanuel.com](mailto:anthonyalden@quinnemanuel.com) | [www.quinnemanuel.com](http://www.quinnemanuel.com)

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**From:** Mazza, Mia [mailto:MMazza@mofo.com]  
**Sent:** Tuesday, March 06, 2012 5:57 PM  
**To:** Anthony Alden  
**Cc:** AppleMoFo; Samsung v. Apple; WH Apple Samsung NDCal Service  
**Subject:** Apple v. Samsung: Discovery Correspondence - Jae Hwang Sim Deposition

<<2012-03-06 Ltr Pernick to Alden re Sim Depo.pdf>>

Hi Anthony,

Attached please find correspondence from Marc Pernick regarding the start and end times for the deposition of Jae Hwang Sim.

Regards,

**Mia Mazza**  
**Morrison & Foerster LLP**  
**San Francisco**  
**(415) 268-6024 office**  
**(415) 302-6583 mobile**  
**(415) 268-7522 fax**

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