

Exhibit 20

April 25, 2012

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By Email (pchassman@winston.com)

Peter J. Chassman
Winston & Strawn LLP
1111 Louisiana, 25th Floor
Houston, TX 77002

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

Dear Mr. Chassman:

As counsel for Apple in the above-referenced matter, we write to you in your capacity as counsel for Motorola. The information provided below has already been given to Motorola through Quinn Emanuel, the firm that represents Motorola in *Apple Inc. v. Motorola Inc. et al.*, No. 11-cv-08540 (N.D. Ill.). Quinn Emanuel advised us today, however, that you are the appropriate contact for purposes of this issue.

As the result of a motion recently filed by Samsung, Apple has been ordered to produce unredacted copies of all court documents filed in *Certain Mobile Devices And Related Software (Apple v. Motorola)*, ITC Inv. No. 337-TA-750, and *Apple Inc. v. Motorola Inc. et al.*, No. 11-cv-08540 (N.D. Ill.) (formerly *Apple Inc. v. Motorola Inc. et al.*, No. 10-cv-00662 (W.D. Wis.)). A copy of that Order, dated April 12, 2012, is attached. The April 12 Order requires Apple to produce these documents to Samsung by this Friday, April 27, 2012. All documents produced to Samsung under this April 12 Order will be marked and protected as "Highly Confidential" under the enclosed Protective Order.

Apple has already produced all publicly available court documents filed in the above two *Motorola* matters. Apple's outside counsel in those matters has advised us, however, that there are numerous additional court documents that cannot be provided to Apple or Samsung because those documents contain Motorola's confidential business information subject to the Protective Order in the ITC 750 matter. According to Apple's outside counsel, under that Protective Order, documents containing Motorola's confidential information may not be provided to Apple or Samsung without Motorola's approval (or an order from the International Trade Commission).

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This issue comes as no news to Motorola. In various correspondence dating back to February 23, 2012, counsel for Samsung has informed us that they have requested Motorola's approval for this very same production, but Motorola "cannot agree to give Samsung this approval without knowing more about the specific documents in Apple's possession that purportedly contain their confidential business information."

This letter is to clarify for Motorola, if any clarification is needed, that the Motorola confidential information Apple seeks consent to produce to Samsung under the April 12 Order is all confidential information in all court documents filed in *Certain Mobile Devices And Related Software (Apple v. Motorola)*, ITC Inv. No. 337-TA-750 and *Apple Inc. v. Motorola Inc. et al.*, No. 11-cv-08540 (D. Ill.) (formerly *Apple Inc. v. Motorola Inc. et al.*, No. 10-cv-00662 (W.D. Wis.)).

Please let us know by noon Pacific Time on Thursday, April 26, 2012, whether Motorola consents to having this information produced to Samsung pursuant to the enclosed April 12 Order.

Sincerely,

/s/ Mia Mazza

Mia Mazza

Encls.

cc: Diane Hutnyan (counsel for Samsung in *Apple v. Samsung*, Case No. 11-cv-1846-LHK (PSG) (N.D. Cal.))