

EXHIBIT A

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February 3, 2012

Mia Mazza
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425 Market Street
San Francisco, CA 94105-2482

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

Dear Mia:

I write regarding Apple's deficient production of documents, including but not limited to deposition transcripts, expert reports and declarations, and claim construction briefs, from proceedings involving the patents-in-suit and related patents.

For example, Apple has asserted the '381, '129, and '915 patents against HTC in 337-TA-797, yet Apple has produced from this action only the deposition transcript of Scott Herz. Apple has failed to produce, *inter alia*, any other deposition transcripts, any expert claim construction reports, and the claim construction briefs of either party. Apple has also failed to produce *any* documents from its action against HTC in Delaware (*Apple, Inc. v. High Tech Computers*, 10-cv-00167).

These matters directly involve the patents-in-suit, but Apple has similarly failed to produce any documents from actions involving patents related to the patents-in-suit.

All of these materials should have produced months ago in response to Samsung's Request for Production No. 75:

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NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100
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REQUEST FOR PRODUCTION NO. 75:

All DOCUMENTS relating to any lawsuit, administrative proceeding, or other proceeding involving any of the APPLE ACCUSED PRODUCTS, APPLE IP, or patents related to the APPLE PATENTS-IN-SUIT, including, without limitation, any pleading, paper, motion, affidavit, declaration, report, decision, or order, for cases to include, without limitation, C11-80169 MISC JF (HRL) (N.D. Cal.), 337-TA-794 (ITC), 1:2010cv23580 (S.D. Fla.), 1:2010cv06385 (N.D. Ill.), 1:2010cv06381 (N.D. Ill.), 337-TA-745 (ITC), 1:2010cv00166 (D. Del.), 1:2010cv00167 (D. Del.), 337-TA-724 (ITC), 3:2010cv00249 (W.D. Wisc.), and 337-TA-701 (ITC).

Further, Apple's failure to produce deposition transcripts from these actions is in direct violation of the Court's Order to Apple to produce by January 15, 2012 "all responsive transcripts" of Apple witnesses bearing a "technological nexus" to the patents-in-suit. (Dkt. 536 at 5).

Please produce immediately *all* relevant documents from Apple's other actions involving the patents-in-suit and any related patents. If Apple has already produced any of these documents, please identify where they are by Bates number. If Apple will not produce all of these documents by Sunday, February 5, please let us know why and propose some kind of reasonable, prompt and final resolution to the issue. If we cannot reach agreement by Sunday, we will put this on our February 6 lead counsel meet-and-confer agenda.

Kind regards,

/s/

Diane C. Hutnyan