

EXHIBIT C

February 10, 2012

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By Email (dianehutnyan@quinnemanuel.com)

Diane Hutnyan
Quinn Emanuel
865 South Figueroa St., 10th Floor
Los Angeles, CA 90017-2543

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

Dear Diane:

I write in response to your February 3, 2012, and February 8, 2012, letters requesting documents from proceedings involving the patents-in-suit.

It appears from your letters that Samsung has been aware of all related proceedings involving the patents-in-suit or related patents. Samsung has listed all such proceedings in both its Request for Production No. 75 and again in its February 8 letter. Apple is not aware of any other proceedings that involve the patents-in-suit or related patents.

As for your request that Apple produce "materials" from "any other cases having a technological nexus to the issues in this case," Apple declines to do so. Pursuant to the Court's January 15, 2012 Order, Apple will only produce the deposition transcripts of Apple witnesses bearing a "technological nexus" to the patents-in-suit. Your document requests do not seek all materials from cases with a "technological nexus" with this case. Your sudden expansion of your request to include all such documents appears to be for the purpose of harassment.

Furthermore, Samsung appears to have done nothing for several months despite Judge Grewal ordering Samsung to take on the tasks of obtaining third party approval. As stated in the February 6, 2012, meet-and-confer with lead counsel, Samsung needs to obtain this consent before Apple can produce unredacted confidential documents. Once Samsung obtains this consent, Apple will promptly produce such documents.

Sincerely,

/s/ Jason R. Bartlett

Jason R. Bartlett

cc: Peter Kolovos, S. Calvin Walden