

# EXHIBIT E

**quinn emanuel trial lawyers | los angeles**

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017-2543 | TEL: (213) 443-3000 FAX: (213) 443-3100

WRITER'S DIRECT DIAL NO.  
**(213) 443-3666**

WRITER'S INTERNET ADDRESS  
**dianehutnyan@quinnemanuel.com**

February 19, 2012

**VIA ELECTRONIC MAIL**

Mia Mazza, Esq.  
Morrison & Foerster  
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 am writing to again request that Apple produce relevant materials from other related lawsuits and actions that bear a technological nexus to the instant litigation. In my letter of February 13, I identified 15 such cases. At the Lead Counsel Meet and Confer on February 14 and 15, Apple represented that it would tell Samsung by Friday, February 17 from which of these cases it was willing to produce materials. Samsung has not yet received any correspondence providing this information. Accordingly, Samsung will assume that Apple has agreed to produce all relevant materials from these 15 cases.

That said, Samsung understands that the case records for some of these actions contain the confidential business information of other entities, namely Google, Amtel, HTC, Motorola and Nokia. Samsung has been in contact with each of these entities to resolve this issue and thus provides the following guidelines to Apple in making this production:

Google does not object to sharing any of its confidential business information contained in court papers in Apple's prior Android-related actions against HTC or Motorola, on the condition that all the documents are produced with the **HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY** designation. Also, Google's consent is limited to technical materials, such as those regarding validity and infringement issues, and does not extend to any documents concerning

**quinn emanuel urquhart & sullivan, llp**

NEW YORK | 51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, California 94111-4788 | TEL (415) 875-6600 FAX (415) 875-6700

SILICON VALLEY | 555 Twin Dolphin Drive, 5th Floor, Redwood Shores, California 94065-2139 | TEL (650) 801-5000 FAX (650) 801-5100

CHICAGO | 500 W. Madison Street, Suite 2450, Chicago, Illinois 60661-2510 | TEL (312) 705-7400 FAX (312) 705-7401

WASHINGTON, DC | 1299 Pennsylvania Avenue NW, Suite 825, Washington, District of Columbia 20004-2400 | TEL (202) 538-8000 FAX (202) 538-8100

LONDON | 16 Old Bailey, London EC4M 7EG, United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

TOKYO | NBF Hibiya Building, 25F, 1-1-7, Uchisaiwai-cho, Chiyoda-ku, Tokyo 100-0011, Japan | TEL +81 3 5510 1711 FAX +81 3 5510 1712

MANNHEIM | Erzbergerstraße 5, 68165 Mannheim, Germany | TEL +49(0) 621 43298 6000 FAX +49(0) 621 43298 6100

MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

purely business information such as agreements with OEMs. Please produce all relevant materials immediately, making any redactions still required by Google (although as a practical matter the technical information we have requested – such as claim construction briefing, technical expert reports and declarations, and deposition transcripts – is unlikely to contain pure business information).

Atmel consents to disclosure of Atmel's confidential business information disclosed in the Motorola investigations, on the condition that all the documents are produced with the **HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY** designation. Please produce all relevant materials immediately.

Motorola will not consent to the disclosure of its confidential business information. Therefore, please redact all Motorola confidential business information from the materials Apple will produce from the 15 identified actions and produce it.

We will update you as to the status of our negotiations with Nokia and HTC, which we hope to conclude soon.

Of course, Apple should immediately produce full, unredacted materials from any of the 15 cases that contain no confidential business information.

Additionally, under the Court's December 22, 2011 order Apple has been compelled to produce all deposition transcripts from cases with a technological nexus to the instant litigation by January 15. Over a month later, Apple has admitted it has not fully complied. Samsung therefore requests that all such transcripts be produced without further delay. Please produce them immediately and confirm that you have done so, including identifying them by bates number within Apple's production.

Kind regards,

*/s/ Diane C. Hutnyan*

Diane C. Hutnyan