

# EXHIBIT 29

April 24, 2012

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*By Email* (dianehutnyan@quinnemanuel.com)

Diane Hutnyan  
Quinn Emanuel  
865 S. Figueroa St., 10th Floor  
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Re: *Apple v. Samsung*, Case No. 11-cv-1846-LHK (PSG) (N.D. Cal.)

Dear Diane:

This responds to your letter dated April 20, 2012, regarding the deposition of Dr. Sanjay Sood. Apple timely served Dr. Sood's expert report on March 22, 2012, and his deposition was taken on April 20, 2012. Although it had Dr. Sood's report for approximately a month before the deposition, at no time did Samsung request any additional information regarding Dr. Sood's report or the academic papers cited therein. At the deposition, Samsung requested, for the first time, questionnaires related to two academic papers. Samsung now posits that Apple has a "choice" either to produce the additional information and present Dr. Sood for a second deposition or Samsung may move to exclude aspects of Dr. Sood's report that Samsung contends are based on the newly requested documents. Samsung's position is meritless.

There is no entitlement to every document underlying every study cited in an expert report. Further, Samsung's request is untimely. Samsung had the opportunity to request additional documents about which it intended to question Dr. Sood, but Samsung failed to do so during the several-week interval between receipt of his report and the deposition. In any event, Samsung had the opportunity to thoroughly examine Dr. Sood about his report and his research. The additional information requested by Samsung is cumulative of information contained in the articles themselves, as Dr. Sood explained during his deposition. The articles present information sufficient for reviewers to assess the papers and for other academics to consider and analyze them. It is implausible that Samsung's needs are even more extensive than academics who actually work in this field.

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Apple will investigate whether additional information is available (as it attempted to do as a matter of professional courtesy during the deposition). If the information is available, Apple will produce it. However, Dr. Sood will not be made available for another deposition.

Sincerely,

*/s/ Mia Mazza*

Mia Mazza

cc: S. Calvin Walden  
Peter Kolovos