

# EXHIBIT 11

May 4, 2012

By Email (dianehutnyan@quinnemanuel.com)

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

Dear Diane:

This letter responds to yours of March 3, 2012, regarding Apple's compliance with Part B.2 of the Court's April 12 Order.

Apple's production of court documents from the eight cases is nearly complete, but it is not yet complete. Below is a summary of status for each case.

- *Nokia Delaware*: Complete.
- *Motorola Wisconsin (661 case)*: Complete.
- *HTC ITC*: Complete.
- *HTC Delaware*: Counsel for Apple in the *HTC Delaware* action is still awaiting approval from Google as to four documents. Otherwise the production is complete.
- *Elan Northern District California*: Counsel for Apple in the *Elan N.D. Cal.* action has received notification from Elan that the following sealed docket entries do not contain Elan CBI: 210, 236, 241, 247, 251, 252, 253, 254, 342, 358, 363, 372, and 375. Counsel for Apple in that action is in the process of reviewing those documents to confirm that can now be released to us. We will produce the documents in those 13 docket entries as quickly as we can. From what we can tell from the docket sheet, approximately 10 docket entries remain. Elan states that is has not yet decided whether it will oppose any disclosure of Elan's CBI in these remaining 10 docket entries. Counsel for Apple in the *Elan N.D. Cal.* action have notified the one nonparty, Cirque, whose CBI apparently was included in the sealed documents in the *Elan N.D. Cal.* action. Cirque has not indicated its intent to object. Therefore, we are just waiting on Elan.

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- *Elan ITC*: Counsel for Apple has received notification from Elan that it intends to oppose Apple's motion for permission to produce CBI from the ITC. In addition, nonparties Lucent and Synaptics have not responded to a request for consent. Counsel for Apple estimates that there are a total of 100 documents plus exhibits that remain to be produced pending consent of Elan and these two nonparties.
- *Motorola Illinois*: Counsel for Apple has recently received notification from Motorola that it no longer objects to production of its CBI to all counsel of record for Apple and Samsung in this case. All documents from the *Motorola Illinois* case for which Apple has received permissions have already been produced. Counsel for Apple estimates that there are 30-40 documents, plus related exhibits, that are still awaiting nonparty consents before they can be released. The nonparties whose consent will be necessary to release all of these documents are AT&T, Synaptic, Broadcom, Microsoft, NYU, TED Conferences, Texas Instruments, Nokia Siemens Networks, and Ericsson.
- *Motorola ITC*: Weil is in the process of identifying whether there are additional documents from the *Motorola ITC 750* case it can now release, absent further nonparty permissions, and if there are, we will produce as quickly as we can. Counsel for Apple estimates that there are 20-25 documents, plus related exhibits, that are still awaiting nonparty consents before they can be released. The nonparties whose consent will be necessary to release all of these documents are Debbie Coutant, Thomas Cronan, and University of Delaware.

We do not have an index showing each of the documents still affected by these CBI issues in each of these cases. We cannot prepare one, because we are not privileged to see the documents until consent to produce is obtained. With respect to the *Elan ITC* matter, the docket sheet reflects what is being withheld—all documents that were filed confidentially as opposed to publicly.

Sincerely,

/s/ Mia Mazza

Mia Mazza

cc: S. Calvin Walden  
Peter Kolovos