

EXHIBIT 3

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

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VIA ELECTRONIC MAIL

Mia Mazza, Esq.
Morrison & Foerster LLP
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 in response to the portion of your April 30 letter demanding identification of the deponents allowed Samsung by Magistrate Judge Grewal's April 12 Discovery Order.

On April 12, Judge Koh required the parties to narrow the issues significantly in anticipation for trial. Because Apple has not meaningfully narrowed its claims to date, the Court ordered the parties to conduct additional claim-reduction by Monday. The parties' lead counsel is meeting today to further this process. It would, therefore, be premature for Samsung to designate additional deponents. Apple should not force Samsung to blindly proceed with the additional depositions on claims and issues that Apple will end up dropping on Monday.

That said, we are working through the more than 200 transcripts Apple withheld since January 15 and should be able to identify the Apple deponents within a reasonable period of time after Apple has sufficiently narrowed its claims. If Apple refuses to cooperate in providing our requested witnesses after May 10, should that be necessary, we will show the Court how Apple's latest violation and refusal to cooperate has worked to compound the substantial prejudice the Court already determined Apple had caused Samsung by violating the December 22 order.

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

Kind regards,

/s/ Diane C. Hutnyan

Diane C. Hutnyan