

Exhibit 16

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April 22, 2012

VIA E-MAIL

Mia Mazza
Morrison & Foerster LLP
425 Market Street
San Francisco, CA 94105

Re: Apple v. Samsung, Case No. 11-cv-01846 (LHK) (N.D. Cal.)

Dear Mia:

During the March 20, 2012 deposition of Ravin Balakrishnan, Dr. Balakrishnan testified that he physically examined the accused Samsung products listed in his expert report on infringement. (*See* Balakrishnan Dep. at 38:25-39:10). When asked whether he still had possession of these products, he testified that “[t]hey were at counsel’s, Apple’s counsel’s office. I imagine they still have them.” (*Id.* at 39:12-16).

In the Expert Report of Ravin Balakrishnan, Ph.D. Regarding Infringement of U.S. Patent No. 7,469,381 (“Balakrishnan Infringement Report”), Dr. Balakrishnan stated:

17. I have examined the following Samsung products: the Captivate; Continuum; Droid Charge; Epic 4G; Exhibit 4G; Fascinate; Galaxy Ace; Galaxy Prevail; Galaxy S (i9000); Galaxy S 4G; Galaxy S II (including its i9100, AT&T, and Epic 4G Touch variants); Galaxy S Showcase (i500); Galaxy Tab 7.0; Galaxy Tab 10.11; Gem; Gravity Smart; Indulge; Infuse 4G; Intercept; Mesmerize; Nexus S; Nexus S 4G; Replenish; Sidekick; and Vibrant.

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(Balakrishnan Infringement Report at 5).

Dr. Balakrishnan could not recall what version of the Android code was installed on the devices he expected or what version of the Gallery, Contacts or ThinkFree Office software was installed on the devices. (See Balakrishnan Dep. at 40:8-44:4).

Samsung hereby requests that Apple make the devices upon which Dr. Balakrishnan bases his infringement report available for inspection. Please identify a date, time and location during the week of April 23, 2012 that Samsung may inspect the products listed in Dr. Balakrishnan's expert report on infringement.

Regards,

/s/ Ketan V. Patel

Ketan V. Patel