

EXHIBIT H

April 11, 2012

Via E-Mail

Mark Lyon
Gibson Dunn & Crutcher, LLP
1881 Page Mill Road
Palo Alto, California 94304

Re: Apple v. Samsung Elecs. Co. et al, Case No 12-cv-630

Dear Counsel:

I write in advance of the parties' continued meet and confer today regarding Samsung's Responses and Objections to Apple's First Set of Preliminary Injunction Requests for Production. In a good faith effort to meet and confer, Samsung agrees to supplement its prior responses to produce responsive non-privileged documents to Apple's Request for Production Nos. 4, 7, 27, 28, 29, 31, 36, 37, 38, 39, 40, 41 and 89.

With respect to Apple's Request for Production Nos. 9-13, though Samsung has made clear on numerous occasions that it does not have the source code for Galaxy Nexus, Apple contends that these requests also seek "any other instructions utilized by or implemented on the Samsung Galaxy Nexus." *See* April 6, 2012 Letter from Buroker to Fazio at 3. If Apple can clarify what it means by "any other instructions" then Samsung will consider producing documents responsive to these five requests.

Additionally, with respect to Apple's Request for Production Nos. 32, to the extent that this request extends to Samsung's expert witnesses who will provide declarations in support of Samsung's forthcoming Opposition Brief, Samsung will produce documents relied upon by those experts. Samsung notes that this "relied upon" limitation is consistent with the Protective Order applied on an interim basis in this case. *See* Protective Order, ¶ 20.

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 20 7653 2000 FAX +44 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 | Mollstraße 42, 68165 Mannheim, Germany | TEL +49 621 43298 6000 FAX +49 621 43298 6100
MOSCOW | Voentorg Building, 3rd Floor, 10 Vozdvizhenka Street, Moscow 125009, Russia | TEL +7 495 797 3666 FAX +7 495 797 3667

Similarly, as to Apple's Request for Production No. 84, Samsung will produce documents relied upon by Samsung's experts in connection with Samsung's Opposition to Apple's Preliminary Injunction Motion. *See* Protective Order, ¶ 20.

Finally, we will discuss the remainder of the issues raised by Apple in its April 6, 2012 letter during the continued meet and confer today.

Very truly yours,

A handwritten signature in blue ink, appearing to read "M. L. Fazio". The signature is stylized with a large initial "M" and a long horizontal stroke.

Michael L. Fazio