

EXHIBIT E

quinn emanuel trial lawyers | los angeles

865 South Figueroa Street, 10th Floor, Los Angeles, California 90017 | TEL: (213) 443-3000 FAX: (213) 443-3100

September 1, 2011

VIA E-MAIL

Christine Haskett, Esq.
Covington & Burling LLP
One Front Street
San Francisco, CA 94111-5356

Jill Ho, Esq.
Weil, Gotshal & Manges LLP
201 Redwood Shores Parkway
Redwood Shores, CA 94065

Re: Motorola et al. v. Apple

Dear Christine and Jill:

I write to request the supplementation of Apple's production in the S.D. Florida matter (Case No. 1:10-cv-023580).

Apple has asserted EP 1 964 022 ("EP 022") – the European counterpart of U.S. Patent No. 7,657,849 – against various Samsung Electronics entities in the Netherlands. As you are no doubt aware, on August 24, the Dutch Court issued an Order denying Apple's requested relief with respect to EP 022 because "there is a reasonable chance that EP 022...will be considered invalid" after a full trial on the merits.

The prior art cited by Samsung, the Court's opinion, and all documents concerning the litigation of EP 022 are relevant to this action and responsive to several of Motorola's Requests for Production, including but not limited to Request Nos. 2, 15, 16, 18, 28, 36, 37, and 41.

quinn emanuel urquhart & sullivan, llp

NEW YORK | 51 Madison Avenue, 22nd Floor, New York, NY 10010 | TEL (212) 849-7000 FAX (212) 849-7100

SAN FRANCISCO | 50 California Street, 22nd Floor, San Francisco, CA 94111 | TEL (415) 875-6600 FAX (415) 875-6700

SILICON VALLEY | 555 Twin Dolphin Drive, Suite 560, Redwood Shores, CA 94065 | TEL (650) 801-5000 FAX (650) 801-5100

CHICAGO | 250 South Wacker Drive, Suite 230, Chicago, IL 60606 | TEL (312) 463-2961 FAX (312) 463-2962

LONDON | 16 Old Bailey, London EC4M 7EG United Kingdom | TEL +44(0) 20 7653 2000 FAX +44(0) 20 7653 2100

TOKYO | Akasaka Twin Tower Main Bldg., 6th Fl., 17-22 Akasaka 2-Chome, Minato-ku, Tokyo 107-0052 Japan | TEL +81 3 5561-1711 FAX +81 3 5561-1712

Please immediately produce all documents referring or relating to all litigations concerning EP 022 or related patents, including but not limited to the Dutch Court's August 24, 2011 decision in Case Nos. 396957 / KG ZA 11-730 and 396959 / KG ZA 11-731, the prior art relied upon by the Court, and any other prior art produced by Samsung relating to EP 022.

Very truly yours,

/s/ Matthew O. Korhonen

Matthew O. Korhonen