

EXHIBIT 3

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December 19, 2011

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Via E-Mail (dianehutnyan@quinnemanuel.com)

Diane Hutnyan
Quinn Emanuel
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065

Re: *Apple Inc. v. Samsung Elecs. Co. et al.* Case No. 11-cv-1846 LHK (N.D. Cal.)
CONFIDENTIAL—Subject to Protective Order

Dear Diane:

This letter concerns Samsung's production of documents evidencing Samsung's U.S. and worldwide revenue, unit sales and selling price for the accused products (smartphones and tablets). Although Apple has had document requests relating to these subjects outstanding since August 3, 2011, there has been virtually no production of these documents or information. Given that such information is kept and is easily available to Samsung in the ordinary course of business and is unquestionably relevant to disputed issues, there is no excuse for any further delay.

Samsung should immediately produce documents that establish:

- Samsung's U.S. and worldwide revenues for the accused products (1) per smartphone or tablet (2) per carrier (3) per quarter.
- Samsung's U.S. and worldwide unit sales for the accused products (1) per smartphone or tablet (2) per carrier (3) per quarter.
- Samsung's U.S. and worldwide average selling price for the accused products (1) per smartphone or tablet (2) per carrier (3) per quarter.

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Diane Hutnyan
December 19, 2011
Page Two

All figures provided should tie to Samsung's general ledger, should include any carrier subsidies, rebates or payments, and should be provided in U.S. dollars (including any currency conversions used). To the extent that Samsung contends that any form of damages will include less than a full quarter for any product, Samsung must provide these figures on a monthly basis for that product and the specific quarter (or monthly for all products and periods). All figures should be provided from the date the product was first available in the U.S. or worldwide.

These documents are responsive to at least the following requests: RFPs 34, 41-42, 44, and 47; *see also* RFPs 260-267 and 461-462. They do not fall within the "reciprocity categories" in Exhibits A and B. As specified in Wes Overson's November 22, 2011, letter to Rachel Kassabian, Apple does not view this category of documents as lending itself well to the parties' current process of negotiating reciprocal production agreements.

Please be prepared to discuss this issue during Wednesday's meet-and-confer call, and to provide a date certain within the near future when the above-listed documents and information will be produced.

Best regards,

/s/ Mia Mazza

Mia Mazza

cc: Samuel Maselli
Peter J. Kolovos
S. Calvin Walden