

# **EXHIBIT 7**

**FILED UNDER SEAL**

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January 18, 2012

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*By Email* (rachelkassabian@quinnemanuel.com)

Rachel Herrick Kassabian  
Quinn Emanuel  
555 Twin Dolphin Drive, Fifth Floor  
Redwood Shores, CA 94065

Re: *Apple v. Samsung*, Case No. 11-cv-1846-LHK (PSG) (N.D. Cal.)

Dear Rachel:

We write concerning documents Apple requires for the January 24 deposition of Tim Sheppard.

First, it appears from our searches that no documents in Samsung's production are sourced to Mr. Sheppard as custodian, or to anyone who reports to him in the STA accounting department. If that is incorrect, please identify by Bates ranges the documents Samsung has produced that are sourced to Mr. Sheppard, or provide us with the "Custodian Name" provided on such documents as produced.

Second, your January 10, 2012 letter to Mr. McElhinny regarding Samsung's production of financial documents states "that much of the financial information Apple seeks has already been produced to Apple," and lists categories of documents produced. Samsung's opposition to Apple's motion to compel also states Samsung has already produced significant financial information to Apple. As we noted in our motion to compel, however, we have found only random, unconnected, and not comprehensive pieces of financial information in Samsung's production. If Samsung has produced continuous data from a reliable source respecting the categories of documents set forth in your January 10, 2012 letter, then please identify the relevant bates numbers in advance of the Sheppard deposition.

Third, Apple may use the spreadsheets identified by beginning Bates number below during the deposition of Mr. Sheppard. However, these spreadsheets are formatted in a way that will make using them at deposition difficult. For example, not all columns from the same worksheet were printed on the same page. In addition, column header information does not repeat across rows spanning multiple pages. Please produce these documents in native format at least 48 hours before Mr. Sheppard's deposition, or alternatively, please send us replacement images formatted for use at deposition. For the latter option, please produce the documents in landscape format, on legal-sized paper, such that the spreadsheets are no more

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than one page wide, and each column of the spreadsheet appears on the same page, with the column headers repeating atop each page.

- S-ITC-007274354-4460
- S-ITC-007274260-4353
- S-ITC-000113382
- S-ITC-001013752
- S-ITC-000112496
- S-ITC-005244031
- S-ITC-005258432
- S-ITC-005199065
- SAMNDCA00235774
- SAMNDCA00236848
- SAMNDCA10180955
- SAMNDCA10212968
- S-ITC-005207737
- S-ITC-005208909
- S-ITC-005420193
- S-ITC-005434826

If Samsung does not provide the below spreadsheets in one of these two formats, Apple reserves the right to deduct from the total deposition time any time unnecessarily spent deciphering the spreadsheets as originally produced. Please advise me and my team via email at [AppleMofa@mofa.com](mailto:AppleMofa@mofa.com) immediately upon Samsung's production of new images or native versions of these documents.

If Samsung does not timely address each of Apple's three concerns above, Apple reserves the right to continue the deposition of Mr. Sheppard. We look forward to hearing from you.

Sincerely,

*/s/ Mia Mazza*

Mia Mazza

cc: Samuel Maselli  
S. Calvin Walden  
Peter Kolovos