

EXHIBIT 2

Apple Inc.
Amended Document Retention Notice Distribution

Apple v. Samsung (Offensive Case)
Case No. 11-cv-1846-LHK (PSG) (N.D. Cal.)
337-TA-796 (ITC)

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Frank Casanova	4/29/11, 6/28/11, 7/29/11
Imran Chaudhri	4/29/11, 6/28/11, 7/29/11
Mike "Finance" Chen	4/29/11, 6/28/11, 7/29/11
Wei Chen	12/5/11
Greg Christie	4/29/11, 6/28/11, 7/29/11
Amy Chuang	1/25/12
Jai Chulani	4/29/11, 6/28/11, 7/29/11
Patrick Lee Coffman	7/29/11
Tim Cook	7/29/11
Daniel Coster	4/29/11, 6/28/11, 7/29/11
Caroline Cranfill	9/30/11
Daniele De Iuliis	4/29/11, 6/28/11, 7/29/11
Allen Denison II	4/29/11, 6/28/11, 7/29/11
George Dicker	9/27/11
Richard Dinh	1/11/12
Dan Dion	4/29/11, 6/28/11, 7/29/11
Kaiann Drance	4/29/11, 6/28/11, 7/29/11
John Elias	4/29/11, 6/28/11, 7/29/11
Matt Evans	9/30/11
Scott Forstall	6/28/11, 7/29/11
Nitin Ganatra	7/29/11

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Recipient	Date(s) Legal Hold Notice Issued
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Morgan Grainger	1/11/12
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Harry (Haitao) Guo	9/27/11
Myra Haggerty	1/11/12
Bradley J. "BJ" Hamel	4/29/11, 6/28/11, 7/29/11
Evans Hankey	4/29/11, 6/28/11, 7/29/11
Chris Harris	1/11/12
Emily Harrold	2/3/12
David Heller	9/30/11, 1/11/12
Scott Herz	4/29/11, 6/28/11, 7/29/11
Phil Hobson	1/11/12
Quin Hoellwarth	4/29/11, 6/28/11, 7/29/11
Chris Hood	1/11/12
Natalie Hood	4/29/11, 6/28/11, 7/29/11
Steve Hotelling	6/28/11, 7/29/11
Richard Howarth	4/29/11, 6/28/11, 7/29/11
Brian Huppi	2/23/12
James Imahiro	12/5/11
Jonathan Ive	4/29/11, 6/28/11, 7/29/11
Timothy Johnson	7/29/11
Greg Joswiak	4/29/11, 6/28/11, 7/29/11, 9/27/11
Eric Jue	4/29/11, 6/28/11, 7/29/11
Zack Kamen	1/11/12
Duncan Kerr	4/29/11, 6/28/11, 7/29/11
Kurt Knight	4/29/11, 6/28/11, 7/29/11
Jo-Anne Knysh	4/29/11, 6/28/11, 7/29/11
Kenneth Kocienda	7/29/11
Garwood Kotite	4/29/11, 6/28/11, 7/29/11
Chris Krah	12/5/11
Noreen Krall	4/29/11, 6/28/11, 7/29/11
Yuta Kuboyama	9/27/11
Henri Lamiriaux	7/29/11
Chuck Lancaster	4/29/11, 6/28/11, 7/29/11
Brian Land	6/28/11, 7/29/11
Tom LaPerle	4/29/11, 6/28/11, 7/29/11
Aidan Lawlor	1/11/12
Mark Lee	1/11/12

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Steve Lemay	4/29/11, 6/28/11, 7/29/11
Ana Lin	4/29/11, 6/28/11, 7/29/11
Suzanne Lindbergh	1/11/12
Chip Lutton	4/29/11, 6/28/11, 7/29/11
Jeff Maranhas	4/29/11, 6/28/11, 7/29/11
Paul Marcos	7/29/11
Natalia Maric	2/1/12
Timothy Martin	9/30/11
David Moody	4/29/11, 6/28/11, 7/29/11
Stan Ng	4/29/11, 6/28/11, 7/29/11
Peggy Nguyen	4/29/11, 6/28/11, 7/29/11
Shin Nishibori	4/29/11, 6/28/11, 7/29/11
Gregory Novick	7/29/11
Bas Ording	4/29/11, 6/28/11, 7/29/11
Achim Pantfoerder	7/29/11
Chuck Pisula	7/29/11
Andrew Platzter	4/29/11, 6/28/11, 7/29/11
Chris Prest	1/11/12
Barbara Poyer	4/29/11, 6/28/11, 7/29/11
Arthur Rangel	9/27/11
Monique Relova	9/27/11
Jeff Robbin	9/30/11, 1/11/12
Chris Roberts	4/29/11, 6/28/11, 7/29/11
Matthew Rohrbach	4/29/11, 6/28/11, 7/29/11
Fletcher Rothkopf	1/11/12
Peter Russell-Clarke	4/29/11, 6/28/11, 7/29/11
Melinda Sammons	4/29/11, 6/28/11, 7/29/11
Justin Santamaria	9/27/11
Phil Schiller	9/27/11
Raymond Sepulveda	9/30/11
Bruce Sewell	7/29/11
Mike Shebanek	12/5/11
Fred Simon	1/11/12
Steve Sinclair	4/29/11, 6/28/11, 7/29/11
Christopher Stringer	4/29/11, 6/28/11, 7/29/11
Davina Takeda	4/29/11, 6/28/11, 7/29/11
Tang Yew Tan	4/29/11, 6/28/11, 7/29/11
Michael Tchao	9/27/11
Boris Teksler	4/29/11, 6/28/11, 7/29/11

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Marcel Van Os	6/28/11, 7/29/11
Aaron Von Minden	1/11/12
Alan Wang	4/29/11, 6/28/11, 7/29/11
Erik Wang	4/29/11, 6/28/11, 7/29/11
BJ Watrous	1/11/12
Wayne Westerman	4/29/11, 6/28/11, 7/29/11
Eugene Whang	4/29/11, 6/28/11, 7/29/11
Cyndi Wheeler	4/29/11, 6/28/11, 7/29/11
Tamara Whiteside	12/5/11
Jayna Whitt	4/29/11, 6/28/11, 7/29/11
Lisa Widup	4/29/11, 6/28/11, 7/29/11
Richard Williamson	6/28/11, 7/29/11
Chris Wysocki	1/11/12
Stephen Zadesky	1/11/12
Rico Zorkendorfer	4/29/11, 6/28/11, 7/29/11

CONFIDENTIAL AND PRIVILEGED

April 29, 2011

Re: *Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC* (collectively "Samsung"), Case No. CV11-1846 (N.D. Cal.) – Document Retention Notice

Apple has sued Samsung and related entities in the United States District Court for the Northern District of California, alleging that Samsung is infringing Apple's trademarks, trade dress, design patents, and utility patents relating to the iPhone and iPad. Apple alleges that Samsung infringes by copying both the design and certain functional features of the iPhone and iPad.

Apple is taking steps to preserve relevant documents and other materials. Regardless of whether documents have been collected from you before, please preserve all documents relating to:

1. Any of the following U.S. patents, each of which is owned by Apple, and the inventors named on these patents:
 - a. U.S. Patent No. 6,493,002, "Method and Apparatus for Displaying and Accessing Control and Status Information in a computer System," to inventors Steven W. Christensen, filed March 20, 1997 and issued on December 10, 2002.
 - b. U.S. Patent No. 7,469,381, "List Scrolling and Document Translation, Scaling, and Rotation on a Touch-Screen Display," to inventor Ben Ording, filed December 14, 2007 and issued on December 23, 2008.
 - c. U.S. Patent No. 7,669,134, "Method and Apparatus for Displaying Information During an Instant Messaging Session," to inventors Gregory N. Christie, Peter Western, Steven Lemay, Jens Alfke, filed May 2, 2003 and issued on February 23, 2010.
 - d. U.S. Patent No. 7,812,828, "Ellipse Fitting for Multi-Touch Surfaces," to inventors Wayne Westerman, John Elias, filed February 22, 2007 and issued on October 12, 2010.
 - e. U.S. Patent No. 7,844,915, "Application Programming Interfaces for Scrolling Operations," to inventors Andrew Platzer, Scott Herz, filed January 7, 2007 and issued on November 30, 2010.
 - f. U.S. Patent No. 7,853,891, "Method and Apparatus for Displaying a Window for a User Interface," to inventors Imran Chaudhri, Bas Ording, filed February 1, 2008 and issued on December 14, 2010.
 - g. U.S. Patent No. 7,863,533, "Cantilevered Push Button Having Multiple Contacts and Fulcrums," to inventors Bradley Hamel, Tang Yew Tan, Erik Wang, filed September 26, 2008 and issued on January 4, 2011.
 - h. U.S. Patent No. D627,790, "Graphical User Interface for a Display Sscreen or Portion Thereof," to inventor Imran Chaudhri, filed August 20, 2007 and issued on November 23, 2010.
 - i. U.S. Patent No. D602,016, "Electronic Device," to inventors Bartley Andre, Daniel Coster, Daniele De Iuliis, Richard Howarth, Jonathan Ive, Steve Jobs, Duncan Kerr, Shin Nishibori, Matthew Rohrbach, Peter Russell-Clarke, Douglas Satzger, Christopher Stringer, Eugene Whang, Rico Zorkendorfer, filed June 6, 2008 and issued on October 13, 2009.
 - j. U.S. Patent No. D618,677, "Electronic Device," to inventors Bartley Andre, Daniel Coster, Daniele De Iuliis, Richard Howarth, Jonathan Ive, Steve Jobs, Duncan Kerr, Shin Nishibori, Matthew Rohrbach, Douglas Satzger, Calvin Seid, Christopher Stringer, Eugene Whang, Rico Zorkendorfer, filed Nov. 18, 2008 and

issued on June 29, 2010.

2. Conception, development and implementation of the inventions described in the Patents listed in category 1.
3. The filing, prosecution, review or issuance of the Patents listed in category 1.
4. Communications (including but not limited to emails, letters, notes, and/or memoranda) relating to the patents in Category 1.
5. The filing, maintenance, and/or ownership of the following trademark registrations and applications:
 - a. U.S. Registration No. 3,470,983
 - b. U.S. Registration No. 3,457,218
 - c. U.S. Registration No. 3,457,327
 - d. U.S. Registration No. 3,886,196
 - e. U.S. Registration No. 3,889,642
 - f. U.S. Registration No. 3,866,200
 - g. U.S. Registration No. 3,889,685
 - h. U.S. Registration No. 3,886,197
 - i. U.S. Registration No. 2,935,038
 - j. U.S. Application Serial No. 85/041,463
6. Packaging materials for the iPhone, iPod touch, and iPad products.
7. Marketing materials for the iPhone, iPod touch, and iPad products.
8. Development of the designs for the iPhone, iPod touch, and iPad products.
9. Development, selection, protection and clearance of icons for the iPhone, iPod touch, and iPad products.
10. Documents and physical samples evidencing non-Apple designs of mobile phones created before the release of the iPhone (June 2007) and non-Apple tablet computers created before the release of the iPad (April 2010).
11. Communications with Samsung, including any negotiations or agreements.
12. Samsung's products, icons, product packaging and marketing materials.
13. Customer inquiries or complaints regarding Samsung products, including but not limited to the Android-based mobile phones and tablets.
14. Reports of customer confusion relating to Samsung products, including but not limited to the Android-based mobile phones and tablets.
15. Evaluation of Samsung's products, including but not limited to the Android-based mobile phones and tablets.
16. Any competitive analyses of Samsung.
17. Licenses or agreements that convey patent rights.
18. Financial information relating to the iPhone, iPod touch, and iPad products.
19. The lawsuit between Apple and Samsung, including communications with Legal.

This Notice applies both to documents already in existence and to documents that may be created or received in the future. "Document" includes but is not limited to hard copies (whether handwritten, printed, draft or final), notes, images, videotapes, packaging and other tangible objects. "Document" also includes all forms of electronic data such as e-mails and attachments, iChat, voicemail, spreadsheets, diagrams, CAD files, .wav and html files, whether stored on a hard drive, server, network, legacy system, CD, iPod, iPhone, iPad, PDA, or other storage device or media.

Effective immediately, please suspend applicable document destruction/deletion procedures and take affirmative steps to retain all documents described above. These steps may include keeping relevant email and other documents in designated files that are safe from deletion; modifying email filters, preferences or AppleScripts to prevent automatic deletion (including setting preferences so that SENT emails are retained and not automatically deleted); and stopping

deletion of backups. Each electronic document should be preserved in its existing form to preserve metadata.

Please forward all relevant voicemails, both past and future, to extension 2-5345 (or 2-LEGL). When you forward, please state what matter you believe each message refers to. If you have configured your voicemail messages to be sent to your email in-box, please retain all relevant voicemails, both past and future, by copying or moving such email to designated files that are safe from deletion.

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If you have any doubt about whether to preserve a document, please retain it. This Notice applies to files of current and former employees as well as to documents stored on Apple-owned and personal equipment, such as your own portable or home computer. Don't assume that a document's author or recipient will retain a copy. If the document is in your possession, you should retain it. A failure to comply could have adverse consequences for Apple and may result in disciplinary action. We will notify you when you no longer need to retain the documents.

If you know of other persons who may have relevant information, please contact **Maya Kumar** (contact information below).

Please notify Legal if you would like assistance in preserving data.

If you have any questions or you believe any document described above is not being retained, please contact **Maya Kumar**. This lawsuit should not be discussed unless someone from Legal is present.

Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106
maya_kumar@apple.com

CONFIDENTIAL AND PRIVILEGED

June 28, 2011

Re: *Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC* (collectively "Samsung"), Case No. CV11-1846 (N.D. Cal.) – Document Retention Notice

Apple has sued Samsung and related entities in the United States District Court for the Northern District of California, alleging that Samsung is infringing Apple's trademarks, trade dress, design patents, and utility patents relating to the iPhone and iPad. Apple alleges that Samsung infringes by copying both the design and certain functional features of the iPhone and iPad.

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 - a. U.S. Patent No. 6,493,002, entitled "Method and Apparatus for Displaying and Accessing Control and Status Information in a Computer System," to inventor Steven W. Christensen, filed on March 20, 1997 and issued on December 10, 2002.
 - b. U.S. Patent No. 7,469,381, entitled "List Scrolling and Document Translation, Scaling, and Rotation on a Touch-Screen Display," to inventor Bas Ording, filed on December 14, 2007 and issued on December 23, 2008.
 - c. U.S. Patent No. 7,663,607, entitled "Multipoint Touchscreen," to inventors Steve Hotelling, Joshua A. Strickon, and Brian Q. Huppi, filed on May 6, 2004 and issued on February 16, 2010.
 - d. U.S. Patent No. 7,812,828, entitled "Ellipse Fitting for Multi-Touch Surfaces," to inventors Wayne Westerman and John Elias, filed on February 22, 2007 and issued on October 12, 2010.
 - e. U.S. Patent No. 7,844,915, entitled "Application Programming Interfaces for Scrolling Operations," to inventors Andrew Platzter and Scott Herz, filed on January 7, 2007 and issued on November 30, 2010.
 - f. U.S. Patent No. 7,853,891, entitled "Method and Apparatus for Displaying a Window for a User Interface," to inventors Imran Chaudhri and Bas Ording, filed on February 1, 2008 and issued on December 14, 2010.
 - g. U.S. Patent No. 7,864,163, entitled "Portable Electronic Device, Method and Graphical User Interface for Displaying Structured Electronic Documents," to inventors Bas Ording, Scott Forstall, Greg Christie, Stephen O. Lemay, Imran Chaudri, Richard Williamson, Chris Blumenberg, and Marcel Van Os, filed on September 4, 2007 and issued on January 4, 2011.
 - h. U.S. Patent No. 7,920,129, entitled "Double-Sided Touch-Sensitive Panel With Shield and Drive Combined Layer," to inventors Steve Porter Hotelling and Brian Richards Land, filed on January 3, 2007 and issued on April 5, 2011.
 - i. U.S. Patent No. D504,889, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel J. Coster, Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori, Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang,

and Rico Zorkendorfer, filed on March 17, 2004 and issued on May 10, 2005.

- j. U.S. Patent No. D593,087, entitled "Electronic Device," to inventor Bartley K. Andre, Daniel J. Coster, Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori, Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang, and Rico Zorkendorfer, filed on July 30, 2007 and issued on May 26, 2009.
 - k. U.S. Patent No. D604,305, entitled "Graphical User Interface for a Display Screen or Portion Thereof," to inventors Freddy Anzures and Imran Chaudhri, filed on June 23, 2007 and issued on November 17, 2009.
 - l. U.S. Patent No. D617,334, entitled "Graphical User Interface for a Display Screen or Portion Thereof," to inventor Imran Chaudhri, filed on July 15, 2008 and issued on June 8, 2010.
 - m. U.S. Patent No. D618,677, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel Coster, Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori, Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang, and Rico Zorkendorfer, filed on November 18, 2008 and issued on June 29, 2010.
 - n. U.S. Patent No. D622,270, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel J. Coster, Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori, Matthew Dean Rohrbach, Peter Russell-Clarke, Douglas B. Satzger, Calvin Q. Seid, Vincent Keane Seid, Christopher J. Stringer, Eugene A. Whang, and Rico Zorkendorfer, filed on October 1, 2009 and issued on August 24, 2010.
 - o. U.S. Patent No. D627,790, entitled "Graphical User Interface for a Display Screen or Portion Thereof," to inventor Imran Chaudhri, filed on August 20, 2007 and issued on November 23, 2010.
- 2. Conception, development, and implementation of the inventions described in the patents listed in category 1.
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 - i. U.S. Registration No. 3,889,642

- j. U.S. Registration No. 3,889,685
 - k. U.S. Application Serial No. 77/921,829
 - l. U.S. Application Serial No. 77/921,838
 - m. U.S. Application Serial No. 77/921,869
 - n. U.S. Application Serial No. 85/041,463
 - o. U.S. Application Serial No. 85/299,118
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 - 14. Reports of customer confusion relating to Samsung products, including but not limited to the Android-based mobile phones and tablets.
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If you know of other persons who may have relevant information, please contact Maya Kumar (contact information below).

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Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106
maya_kumar@apple.com

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Attached is a revised document retention notice ("DRN") for the Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively "Samsung") matter. The attached DRN amends and adds certain categories of documents you need to retain. Please review the attached DRN carefully.

If you have any questions, please contact Maya Kumar (contact information below).

Thank you for your help.

Noreen Krall
Senior Director, IP Law and Litigation

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Legal Specialist
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 - 15. Evaluation of Samsung's products, including but not limited to the Android-based mobile phones and tablets.
 - 16. Any competitive analyses of Samsung.
 - 17. Licenses or agreements that convey patent rights.
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If you know of other persons who may have relevant information, please contact Maya Kumar (contact information below).

Please notify Legal if you would like assistance in preserving data.

If you have any questions or you believe any document described above is not being retained, please contact Maya Kumar. This lawsuit should not be discussed unless someone from Legal is present.

Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106
maya_kumar@apple.com

CONFIDENTIAL AND PRIVILEGED

Attached is a revised document retention notice ("DRN") for the Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively "Samsung") and In the Matter of Certain Electronic Digital Media Devices and Components Thereof matters. The attached DRN amends and adds certain categories of documents you need to retain. Please review the attached DRN carefully.

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Thank you for your help.

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CONFIDENTIAL AND PRIVILEGED

July 29, 2011

Re: *Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC* (collectively "Samsung"), Case No. CV11-1846 (N.D. Cal.); and

In the Matter of Certain Electronic Digital Media Devices and Components Thereof,
Investigation No. 337-TA-_____ (ITC)

Apple has filed complaints against Samsung and related entities in the United States District Court for the Northern District of California and with the International Trade Commission, alleging that Samsung is infringing Apple's trademarks, trade dress, design patents, and utility patents relating to the iPod touch, iPhone, and iPad. Apple alleges that Samsung's infringing products copy both the design and certain functional features of these products (all generations), including those provided by the iOS software.

Apple is taking steps to preserve relevant documents and other materials. Regardless of whether documents have been collected from you before, please preserve all documents relating to:

1. Any of the following U.S. patents, each of which is owned by Apple:
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 - c. U.S. Patent No. 7,479,949 C1, entitled "Touch Screen Device, Method, and Graphical User Interface for Determining Commands by Applying Heuristics," to inventors Steven P. Jobs, Scott Forstall, Greg Christie, Stephen O. Lemay, Scott Herz, Marcel van Os, Bas Ording, Gregory Novick, Wayne C. Westerman, Imran Chaudhri, Patrick Lee Coffman, Kenneth Kocienda, Nitin K. Ganatra, Freddy Allen Anzures, Jeremy A. Wyld, Jeffrey Bush, Michael Matas, Paul D. Marcos, Charles J. Pisula, Virgil Scott King, Chris Blumenberg, Francisco Ryan Tolmasky, Richard Williamson, Andre M. J. Boule, and Henri C. Lamiroux, filed April 11, 2008 and issued on January 20, 2009.
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Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

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Legal Specialist
(408) 862-8106
maya_kumar@apple.com

CONFIDENTIAL AND PRIVILEGED

July 29, 2011

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Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106
maya_kumar@apple.com

CONFIDENTIAL AND PRIVILEGED

August 1, 2011

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Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

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Legal Specialist
(408) 862-8106
maya_kumar@apple.com

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16. Any competitive analyses of Samsung.
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Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106
maya_kumar@apple.com

Tuesday, January 17, 2012 12:25 PM

Subject: Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC - Document Retention Notice

REDACTED



CONFIDENTIAL AND PRIVILEGED

December 5, 2011

Re: *Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC* (collectively "Samsung"), Case No. CV11-1846 (N.D. Cal.); and

In the Matter of Certain Electronic Digital Media Devices and Components Thereof, Investigation No. 337-TA-____ (ITC)

Apple has filed complaints against Samsung and related entities in the United States District Court for the Northern District of California and with the International Trade Commission, alleging that Samsung is infringing Apple's trademarks, trade dress, design patents, and utility patents relating to the iPod touch, iPhone, and iPad. Apple alleges that Samsung's infringing products copy both the design and certain functional features of these products (all generations), including those provided by the iOS software.

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Thank you.

Noreen Krall
Senior Director, IP Law and Litigation

Contact for questions:

Maya Kumar
Legal Specialist
(408) 862-8106

maya_kumar@apple.com

Tuesday, January 17, 2012 12:26 PM

Subject: Apple Inc. v. Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC - Document Retention Notice

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Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang, and Rico Zorkendorfer, filed March 17, 2004 and issued on May 10, 2005.

o. U.S. Patent No. D558,757, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel J. Coster,

Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori,

Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene Antony

Whang, and Rico Zorkendorfer, filed January 5, 2007 and issued on January 1, 2008.

p. U.S. Patent No. D593,087, entitled "Electronic Device," to inventor Bartley K. Andre, Daniel J. Coster,

Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori,

Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang,

and Rico Zorkendorfer, filed July 30, 2007 and issued on May 26, 2009.

q. U.S. Patent No. D604,305, entitled "Graphical User Interface for a Display Screen or Portion Thereof," to

inventors Freddy Anzures and Imran Chaudhri, filed June 23, 2007 and issued on November 17, 2009.

r. U.S. Patent No. D617,334, entitled "Graphical User Interface for a Display Screen or Portion Thereof,"

to inventor Imran Chaudhri, filed July 15, 2008 and issued on June 8, 2010.

s. U.S. Patent No. D618,677, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel Coster,

Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori,

Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene A. Whang,

and Rico Zorkendorfer, filed November 18, 2008 and issued on June 29, 2010.

t. U.S. Patent No. D618,678 S, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel J. Coster,

Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori,

Matthew Dean Rohrbach, Douglas B. Satzger, Calvin Q. Seid, Christopher J. Stringer, Eugene Antony Whang,

and Rico Zorkendorfer, filed February 23, 2009 and issued on June 29, 2010.

u. U.S. Patent No. D622,270, entitled "Electronic Device," to inventors Bartley K. Andre, Daniel J. Coster,

Daniele De Iuliis, Richard P. Howarth, Jonathan P. Ive, Steve Jobs, Duncan Robert Kerr, Shin Nishibori,

Matthew Dean Rohrbach, Peter Russell-Clarke, Douglas B. Satzger, Calvin Q. Seid, Vincent Keane Seid,

Christopher J. Stringer, Eugene A. Whang, and Rico Zorkendorfer, filed October 1, 2009 and issued on

August 24, 2010.

v. U.S. Patent No. D627,790, entitled "Graphical User Interface for a Display Screen or Portion Thereof," to

inventor Imran Chaudhri, filed August 20, 2007 and issued on November 23, 2010.

2. Conception, development, and implementation of the inventions described in the patents listed in category 1.
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5. The filing, maintenance, and/or ownership of the following trademark registrations and applications:
 - a. U.S. Registration No. 2,935,038
 - b. U.S. Registration No. 3,457,218
 - c. U.S. Registration No. 3,457,327
 - d. U.S. Registration No. 3,470,983
 - e. U.S. Registration No. 3,886,169
 - f. U.S. Registration No. 3,886,196
 - g. U.S. Registration No. 3,886,197
 - h. U.S. Registration No. 3,866,200
 - i. U.S. Registration No. 3,889,642
 - j. U.S. Registration No. 3,889,685
 - k. U.S. Application Serial No. 77/921,829
 - l. U.S. Application Serial No. 77/921,838
 - m. U.S. Application Serial No. 77/921,869
 - n. U.S. Application Serial No. 85/041,463
 - o. U.S. Application Serial No. 85/299,118
6. Packaging materials for the iPhone, iPod touch, and iPad products.
7. Marketing materials for the iPhone, iPod touch, and iPad products.
8. Development of the designs for the iPhone, iPod touch, and iPad products.
9. Development, selection, protection, and clearance of icons for the iPhone, iPod touch, and iPad products.
10. Documents and physical samples evidencing non-Apple designs of mobile phones created before the release of the iPhone (June 2007) and non-Apple tablet computers created before the release of the iPad (April 2010).
11. Samsung, including any negotiations or agreements between Samsung and Apple.
12. Samsung's products, icons, product packaging, and marketing materials.
13. Customer inquiries or complaints regarding Samsung products, including but not limited to the Android-based mobile phones and tablets.
14. Reports of customer confusion relating to Samsung products, including but not limited to the Android-based mobile phones and tablets.
15. Evaluation of Samsung's products, including but not limited to the Android-based mobile phones and tablets.
16. Any competitive analyses of Samsung.
17. Licenses or agreements that convey patent rights.
18. Financial information relating to the iPhone, iPod touch, and iPad products.
19. The lawsuit between Apple and Samsung, including communications with Legal.

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