# Exhibit 4 (Submitted Under Seal)

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14	CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC	
15	TELECOMMONICATIONS AMERICA, ELC	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CA	LIFORNIA, SAN JOSE DIVISION
17 18	NORTHERN DISTRICT OF CAN APPLE INC., a California corporation,	LIFORNIA, SAN JOSE DIVISION CASE NO. 11-cv-01846-LHK
		CASE NO. 11-cv-01846-LHK
18	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
18 19	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL
18 19 20	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81)
18 19 20 21	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF
18 19 20 21 22	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA,	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81) <u>HIGHLY CONFIDENTIAL –</u> ATTORNEYS' EYES ONLY
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> </ol>	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81) <u>HIGHLY CONFIDENTIAL –</u> ATTORNEYS' EYES ONLY
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> </ol>	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81) <u>HIGHLY CONFIDENTIAL –</u> ATTORNEYS' EYES ONLY
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<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81) <u>HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY</u> <u>UNDER THE PROTECTIVE ORDER</u>
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	APPLE INC., a California corporation, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants.	CASE NO. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S SIXTEENTH SET OF INTERROGATORIES (NO. 81) <u>HIGHLY CONFIDENTIAL –</u> ATTORNEYS' EYES ONLY

already in the possession of Apple, publicly available, or as readily available to Apple as it is to
 Samsung.

3 24. Samsung objects to each interrogatory to the extent that it seeks information before
4 Samsung is required to disclose such information in accordance with any applicable law, such as
5 the Northern District of California Patent Local Rules.

6 25. Samsung objects to the interrogatories on the grounds and to the extent that they
7 seek legal conclusions or call for expert testimony. Samsung's responses should not be
8 construed to provide legal conclusions.

9 Subject to and without waiving the foregoing General Statement and General Objections,
10 Samsung responds as follows:

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## **INTERROGATORIES**

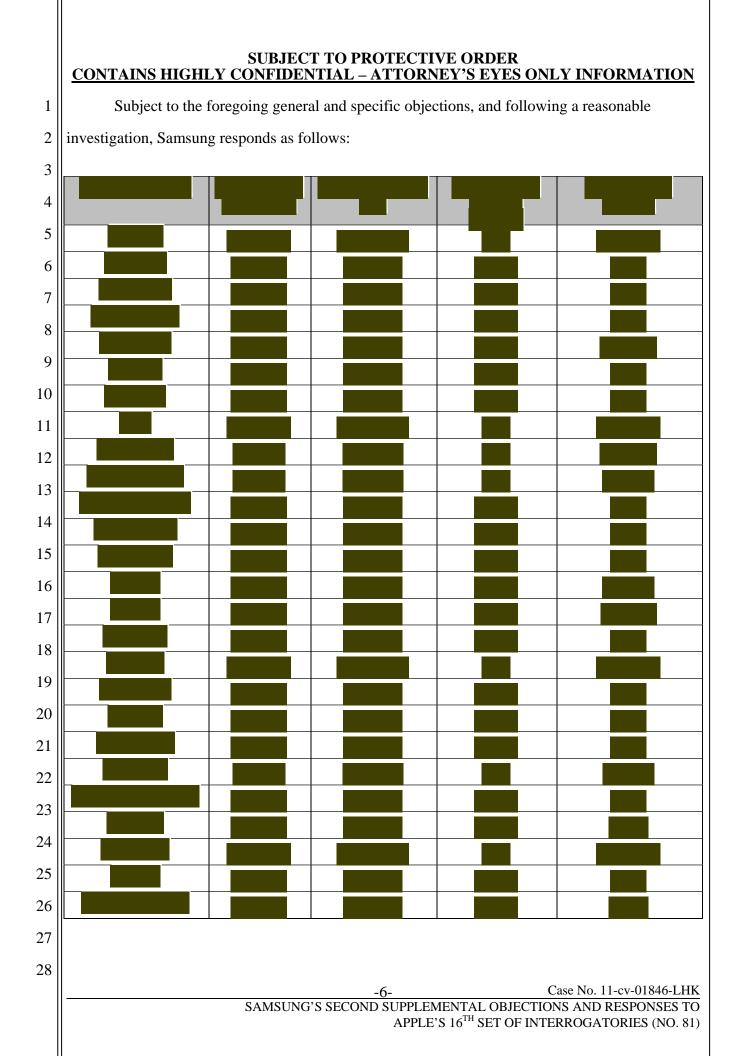
# 14 **INTERROGATORY NO. 1**:

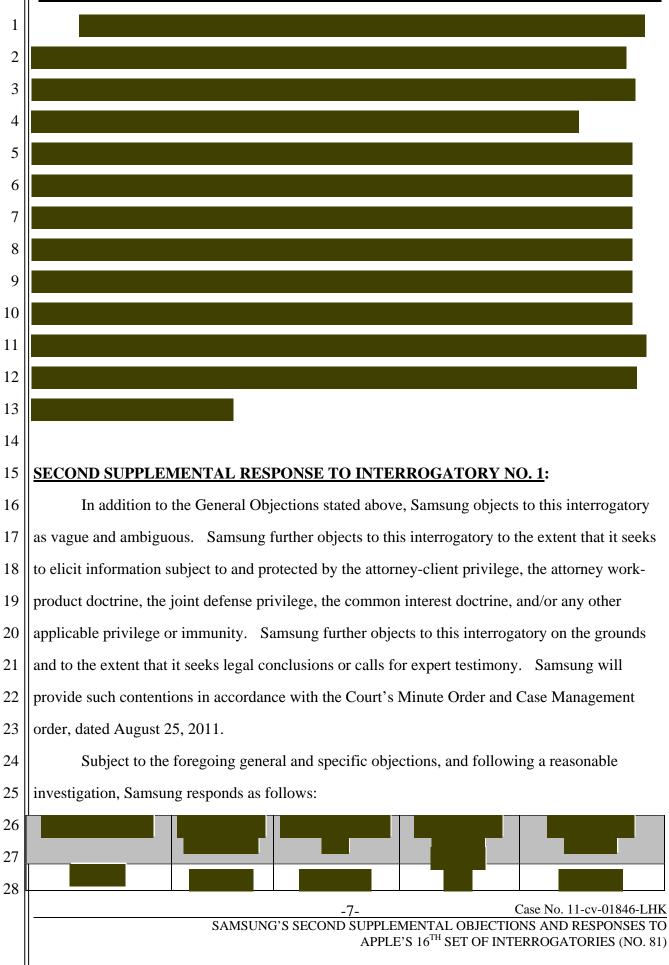
Explain in detail the operation of any monitoring circuitry, integrated circuit, chip,
controller, or module used to operate the touch screens (including the display and touch sensor
panels) and used to respond to touch events for each Product at Issue, with reference to and
identification of specific source code and microcode files and functions.

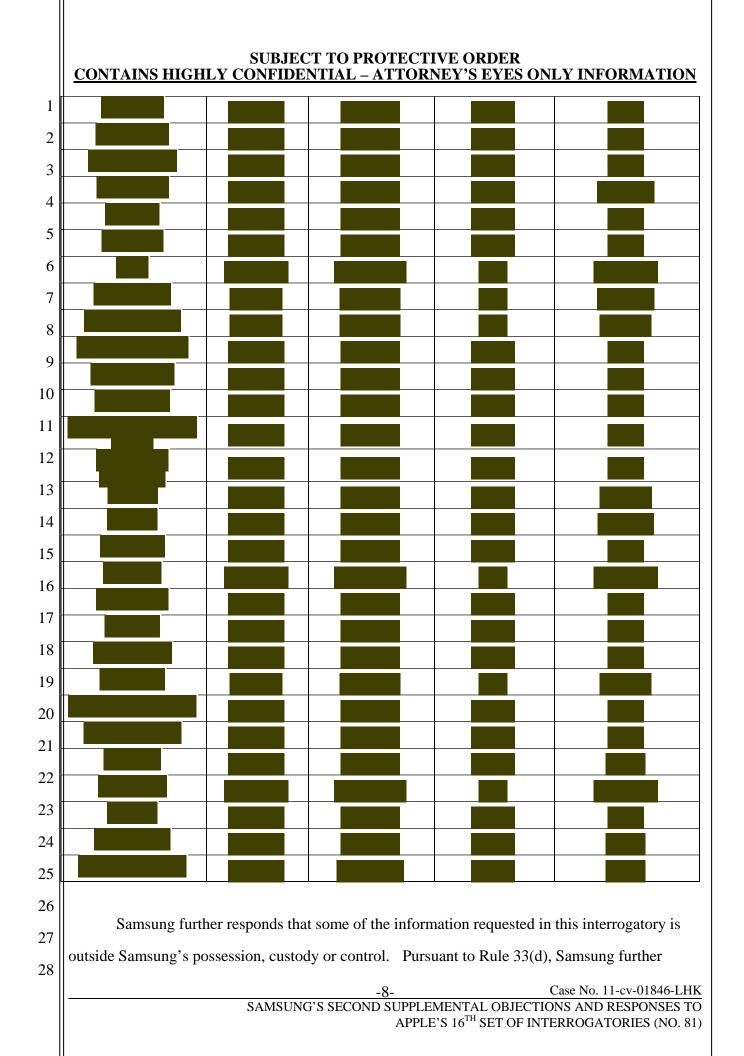
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# 20 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:

21 In addition to the General Objections stated above, Samsung objects to this interrogatory 22 as vague and ambiguous. Samsung further objects to this interrogatory to the extent that it seeks 23 to elicit information subject to and protected by the attorney-client privilege, the attorney work-24 product doctrine, the joint defense privilege, the common interest doctrine, and/or any other 25 applicable privilege or immunity. Samsung further objects to this interrogatory on the grounds 26 and to the extent that it seeks legal conclusions or calls for expert testimony. Samsung will 27 provide such contentions in accordance with the Court's Minute Order and Case Management 28 order, dated August 25, 2011.







1	responds by citing the following documents from which such information may be determined:
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13	DATED: March 22, 2012 QUINN EMANUEL URQUHART & SULLIVAN, LLP
14 15	
16	By Victoria F. Maroulis
17	Charles K. Verhoeven Kevin P.B. Johnson
18	Victoria F. Maroulis Michael T. Zeller
19	
20	Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA,
21	INC., and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC
22	
23	
24	
25	
26	
27	
28	-9- Case No. 11-cv-01846-LHK
	-9- Case No. 11-cv-01846-LHK SAMSUNG'S SECOND SUPPLEMENTAL OBJECTIONS AND RESPONSES TO APPLE'S 16 <sup>TH</sup> SET OF INTERROGATORIES (NO. 81)