

Exhibit 7

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14 LTD., SAMSUNG ELECTRONICS AMERICA,
15 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18
19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
23 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
24 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

25 Defendant.
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
APPLE INC.'S SECOND SET OF
INTERROGATORIES (Nos. 2, 5-6)**

1 **INTERROGATORIES**

2 **INTERROGATORY NO. 2:**

3 For each of the Asserted Claims, set forth in detail Samsung’s bases for asserting the
4 defense of non-infringement, including a claim chart indicating whether each element of the claim
5 is present or absent in each of the Products at Issue and, if Samsung contends that an element is
6 absent, the detailed basis for that contention.

7 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 2:**

8 Samsung objects to this interrogatory as vague and ambiguous. Samsung further objects to
9 this interrogatory to the extent that it seeks to elicit information subject to and protected by the
10 attorney-client privilege, the attorney work-product doctrine, the joint defense privilege, the
11 common interest doctrine, and/or any other applicable privilege or immunity. Samsung objects to
12 Apple’s definition of “Products at Issue” as overly broad, vague, and ambiguous insofar as it
13 includes the undefined categories of “any similar products” and “any products that Apple accuses
14 of infringing its intellectual property in this litigation.” Samsung further objects to this
15 interrogatory as vague since Apple has failed to provide a detailed explanation in its Disclosure of
16 Asserted Claims and Infringement Contentions of the bases for its claims that Samsung allegedly
17 infringes the Asserted Claims. Furthermore, Samsung is presently unable to provide its non-
18 infringement positions because Apple has not served its expert reports identifying how Samsung’s
19 products allegedly infringe Apple’s asserted patents. Samsung further objects to this
20 interrogatory to the extent it prematurely calls for contentions at this stage of litigation. Samsung
21 will provide such contentions in accordance with the Court’s Minute Order and Case Management
22 Order, dated August 25, 2011.

23 Subject to the foregoing general and specific objections, Samsung responds as follows:

24 For U.S. Patent No. 7,812,828, Samsung’s investigation is ongoing and Samsung will
25 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
26 Court’s Minute Order and Case Management Order, dated August 25, 2011.

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1 For U.S. Patent No. 6,493,002, Samsung's investigation is ongoing and Samsung will
2 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
3 Court's Minute Order and Case Management Order, dated August 25, 2011.

4 For U.S. Patent No. 7,469,381, Samsung's investigation is ongoing and Samsung will
5 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
6 Court's Minute Order and Case Management Order, dated August 25, 2011. Samsung also
7 incorporates by reference the Declaration of Jeffrey Johnson in Support of Samsung's Opposition
8 to Apple's Motion for a Preliminary Injunction (Dkt. No. 174).

9 For U.S. Patent No. 7,844,915, Samsung's investigation is ongoing and Samsung will
10 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
11 Court's Minute Order and Case Management Order, dated August 25, 2011.

12 For U.S. Patent No. 7,853,891, Samsung's investigation is ongoing and Samsung will
13 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
14 Court's Minute Order and Case Management Order, dated August 25, 2011.

15 For U.S. Patent No. 7,663,607, Samsung's investigation is ongoing and Samsung will
16 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
17 Court's Minute Order and Case Management Order, dated August 25, 2011.

18 For U.S. Patent No. 7,864,163, Samsung's investigation is ongoing and Samsung will
19 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
20 Court's Minute Order and Case Management Order, dated August 25, 2011.

21 For U.S. Patent No. 7,920,129, Samsung's investigation is ongoing and Samsung will
22 provide its non-infringement position in its expert report(s) to be submitted in accordance with the
23 Court's Minute Order and Case Management Order, dated August 25, 2011.

24 **INTERROGATORY NO. 3:**

25 State in detail the basis of Samsung's contention that Apple's claims are barred "on the
26 basis that the marks and alleged trade dress at issue lack distinctiveness, including, without
27 limitation secondary meaning," as alleged in ¶ 281 of the Answer, including an identification of
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1 objects to this interrogatory as premature to the extent it requests information regarding
2 Samsung's contentions before discovery has been completed or substantially completed, and to the
3 extent it requests information that is or will be the subject of expert testimony.

4 Subject to the foregoing general and specific objections, Samsung responds as follows:

5 Samsung directs Apple to Samsung's Answer in this case. See Dkt. No. 80. Samsung also
6 refers Apple to smartphone and tablet computer product selections available on the market and in
7 retailer stores. Samsung further incorporates by reference its response to Apple's Interrogatory
8 No. 41.

9 Samsung's investigation is ongoing and Samsung will provide its detailed position in its
10 expert report(s) to be submitted in accordance with the Court's Minute Order and Case
11 Management Order, dated August 25, 2011.

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13 DATED: March 8, 2012

Respectfully submitted,

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