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11 Attorneys for Plaintiff and  
 12 Counterclaim-Defendant APPLE INC.

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN JOSE DIVISION

17 APPLE INC.,  
 18 Plaintiff,  
 19 v.  
 20 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 21 ELECTRONICS AMERICA, INC., a New York  
 corporation; SAMSUNG  
 22 TELECOMMUNICATIONS AMERICA, LLC, a  
 Delaware limited liability company,  
 23 Defendants.  
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Case No. 11-cv-01846-LHK (PSG)  
**DECLARATION OF MIA MAZZA  
 IN SUPPORT OF APPLE'S  
 OPPOSITION TO SAMSUNG'S  
 MOTION TO ENFORCE APRIL 12,  
 2012 ORDER**  
 Date: June 21, 2012  
 Time: 10:00 a.m.  
 Place: Courtroom 5, 4<sup>th</sup> Floor  
 Judge: Hon. Paul S. Grewal

1 I, MIA MAZZA, declare as follows:

2 1. I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.  
3 (“Apple”). I am licensed to practice law in the State of California and admitted to practice before  
4 this Court. I have personal knowledge of the matters stated herein or understand them to be true  
5 from members of my litigation team. I make this declaration in support of Apple’s Opposition to  
6 Samsung’s Motion to Enforce April 12, 2012 Order.

7 2. Attached as **Exhibit 1** is a true and correct copy of excerpts of Apple’s  
8 October 26, 2011 Objections and Responses to Samsung’s Second Set of Interrogatories  
9 (Interrogatory No. 19).

10 3. Counsel for Samsung served a notice for the deposition of Saku Hieta, Apple’s  
11 Senior Manager, Wireless Procurement, on February 27, 2012. As of that time, Samsung was  
12 seeking additional deposition time with Tony Blevins, Apple’s Vice President, Procurement,  
13 whom Samsung had already deposed on February 23, 2012.

14 4. Attached as **Exhibit 2** is a true and correct copy of excerpts of the transcript of the  
15 February 23, 2012 deposition of Tony J. Blevins.

16 5. Attached as **Exhibit 3** is a true and correct copy of the March 6, 2012 letter from  
17 Peter Kolovos to Rachel Herrick Kassabian and Diane Hutnyan.

18 6. Counsel for Samsung did not immediately respond to the compromise offer set  
19 forth in Apple’s March 6, 2012 letter. Counsel for Apple e-mailed counsel for Samsung on the  
20 evening of March 7, 2012, and again on March 12, 2012, to inquire about Samsung’s position  
21 with respect to Apple’s proposal. Attached as **Exhibit 4** is a true and correct copy of an e-mail  
22 chain that includes these March 7, 2012 and March 12, 2012 e-mails.

23 7. Samsung ultimately did not accept Apple’s March 6, 2012 compromise proposal  
24 regarding the deposition of Saku Hieta. Apple nevertheless made Mr. Blevins available for  
25 additional deposition testimony on April 3, 2012.

26 8. Attached as **Exhibit 5** is a true and correct copy of a February 23, 2012 e-mail  
27 from Peter Kolovos to Diane Hutnyan.

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1           9.       Attached as **Exhibit 6** is a true and correct copy of Samsung's Notice of  
2 Deposition of Emilie Kim, served on March 6, 2012.

3           10.       Attached as **Exhibit 7** is a true and correct copy of excerpts of the transcript of the  
4 March 7, 2012 deposition of Emilie Kim.

5           11.       Apple has produced to counsel for Samsung unredacted versions of all court  
6 documents filed in the *Nokia* action pending in the District of Delaware (Case No. 09-cv-00791),  
7 the *Motorola* action pending in the Western District of Wisconsin (Case No. 10-cv-00661), and  
8 the *HTC* investigation pending in the ITC (Inv. No. 337-TA-797).

9           12.       Apple has produced to counsel for Samsung unredacted versions of all court  
10 documents filed in the *HTC* action pending in the District of Delaware (Case No. 10-cv-00167),  
11 with the exception of four documents that contain Google CBI for which Google did not provide  
12 consent upon request. Apple has produced redacted versions of those four documents to counsel  
13 for Samsung. Counsel for Apple in the *HTC* Delaware action continues to seek Google's consent  
14 for the production of unredacted versions of these four documents to counsel for Samsung.

15           13.       Apple has produced to counsel for Samsung unredacted versions of all court  
16 documents filed in the *Elan* action litigated in the Northern District of California (Case No. 09-  
17 cv-01531) and the *Elan* investigation in the ITC (Inv. No. 337-TA-714), except for certain docket  
18 entries that contain Elan CBI for which Elan did not provide consent upon request. Counsel for  
19 Apple in the *Elan* matters has provided counsel for Elan with redacted versions of those  
20 remaining documents and has allowed counsel for Elan until June 11, 2012 to correct any  
21 inaccuracies in those redactions. Counsel for Apple in the *Elan* matters will make any  
22 modifications to the redactions that Elan requests and then provide the redacted documents to  
23 counsel for Samsung on or about June 12, 2012. Counsel for Apple in the *Elan* matters continues  
24 to seek Elan's consent for the production of unredacted versions of these documents to counsel  
25 for Samsung.

26           14.       Apple has produced to counsel for Samsung unredacted versions of all court  
27 documents filed in the *Apple v. Motorola* actions pending in the Northern District of Illinois  
28 (Case No. 11-cv-8540, formerly W.D. Wis. 10-cv-00662) and the ITC (Inv. No. 337-TA-750),

1 except for certain docket entries that contain the CBI of 10 nonparties to those actions who did  
2 not provide consent upon request. Counsel for Apple in the *Motorola* matters has prepared  
3 proposed redacted versions of those remaining documents. Counsel has again written to each of  
4 these nonparties providing them until June 6, 2012 to object to the production of redacted  
5 documents to counsel for Samsung. Counsel for Apple in the *Motorola* matters will make any  
6 modifications requested by any of these nonparties and then provide the redacted documents to  
7 counsel for Samsung on or about June 8, 2012.

8 15. As explained in Apple's Motion for Clarification and Status Update (Dkt.  
9 Nos. 887, 903), Apple filed a motion with the ITC seeking permission to produce documents  
10 subject to ITC protective orders, as the ITC does not permit production, even pursuant to the  
11 orders of other courts. As of the date of this Declaration, the ITC has not ruled on this motion.

12 16. In total, Apple has produced more than 3,800 court documents filed in other cases,  
13 pursuant to the April 12, 2012 order.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th  
15 day of June, 2012 at San Francisco, California.

16  
17 /s/ Mia Mazza

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**ATTESTATION OF E-FILED SIGNATURE**

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Mia Mazza has concurred in this filing.

Dated: June 5, 2012

/s/ Michael A. Jacobs  
Michael A. Jacobs