

**DECLARATION OF MIA MAZZA IN SUPPORT  
OF APPLE'S OPPOSITIONS TO SAMSUNG'S  
MOTION FOR SANCTIONS AND MOTION TO  
ENFORCE**

**EXHIBIT 1**

**PUBLIC REDACTED VERSION**

**SUBJECT TO PROTECTIVE ORDER  
CONTAINS CONFIDENTIAL INFORMATION**

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*Attorneys for Plaintiff and  
Counterclaim-Defendant Apple Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

APPLE INC., a California corporation,

Plaintiff,

vs.

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

Defendants.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S OBJECTIONS AND  
RESPONSES TO SAMSUNG'S SECOND  
SET OF INTERROGATORIES**

**CONFIDENTIAL UNDER THE  
PROTECTIVE ORDER**

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SAMSUNG ELECTRONICS CO., LTD., a  
Korean business entity, SAMSUNG  
ELECTRONICS AMERICA, INC., a New  
York corporation, and SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company, a  
California corporation,

Counterclaim-Plaintiffs,

v.

APPLE INC., a California corporation,

Counterclaim-Defendant.

**PLAINTIFF AND COUNTERCLAIM-DEFENDANT APPLE INC.'S  
OBJECTIONS AND RESPONSES TO SAMSUNG'S  
SECOND SET OF INTERROGATORIES (NOS. 19-32)**

Under Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33, Apple Inc. ("Apple") hereby objects and responds to the Second Set of Interrogatories to Apple Inc. (Nos. 19-32) served by Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America LLC (collectively, "Samsung") on September 16, 2011. These responses are based on information reasonably available to Apple at the present time. Apple reserves the right to amend and supplement these responses when and if additional information becomes available.

**GENERAL OBJECTIONS**

Apple makes the following general responses and objections ("General Objections") to each definition, instruction, and interrogatory propounded in Samsung's Second Set of Interrogatories to Apple Inc. These General Objections are hereby incorporated into each

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**OBJECTIONS AND RESPONSES TO INTERROGATORIES**

Subject to the foregoing qualifications and General Objections and the specific objections made below, Apple objects and responds to Samsung Electronics Co. Ltd.'s Second Set of Interrogatories to Apple Inc. as follows:

**Interrogatory No. 19**

Separately for each APPLE ACCUSED PRODUCT, IDENTIFY: (1) the Baseband Processor used; (2) the Executable Software incorporated or installed in the APPLE ACCUSED PRODUCT; (2) the 3 GPP Release(s) supported (including which versions and subversions of the 3GPP specification are supported within each Release); (3) the version(s) of HSUPA supported; and (4) the version(s) of HSDPA supported, and IDENTIFY any documents which reflect these categories of information.

**Response to Interrogatory No. 19**

Apple objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, especially to the extent it seeks information about the accused Apple products beyond the components, functionalities, or technologies of those products that may be relevant to Samsung's patents-in-suit, and/or that Samsung has placed at issue in this case in its Patent Rule 3-1 Disclosures. Accordingly, in responding to this interrogatory, Apple is not providing information about versions of the iPhone 4 and iPad 2 3G that are not compatible with the 3GPP UMTS standard, as those are outside the scope of Samsung's infringement contentions. Apple objects that the phrase "Executable Software incorporated or installed" is vague, overbroad, and not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this

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1 Interrogatory as it contains subparts that each should count as a separate Interrogatory. Apple  
2 objects to the phrases “supported” and “which reflect these categories” as vague and ambiguous.

3 Apple also objects to this Interrogatory to the extent it seeks information that is subject to  
4 a confidentiality or non-disclosure agreement or governed by a protective order preventing its  
5 production, or otherwise seeks confidential, proprietary, or trade secret information of third  
6 parties. Apple further objects to this Interrogatory to the extent it requires information outside  
7 Apple’s possession, custody, and control, including, for example, information concerning  
8 components that Apple has purchased from third parties.

10 Subject to and without waiving the foregoing General and Specific Objections, Apple  
11 responds that in accordance with Federal Rule of Civil Procedure 33(d), Apple has produced  
12 and/or will produce documents responsive to this Interrogatory, and that the burden of  
13 ascertaining the answer to this Interrogatory from the produced business records is substantially  
14 the same for Apple as for Samsung. Apple further designates, at this time, the following  
15 documents from which information responsive to this Interrogatory may be ascertained, which  
16 Apple has produced to Samsung in the matter captioned *In the Matter of Certain Electronic*  
17 *Devices, Including Wireless Communications Devices, Portable Music and Data Processing*  
18 *Devices, and Tablet Computers*, Inv. No. 337-TA-794:

21 Apple iPhone related documents: APL7940001420081 - APL7940001420106,  
22 APL7940001420107 - APL7940001420270, APL7940001420271 - APL7940001420363,  
23 APL7940001420364 - APL7940001420418, APL7940001420419 - APL7940001420468,  
24 APL7940001420469 - APL7940001420529, APL7940001420530 - APL7940001420761, and  
25 APL7940001420762 - APL794000142941.  
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27  
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Apple iPad related documents: APL7940001420942 - APL7940001421023,  
APL7940001421024 - APL7940001421103, and APL7940001421104 - APL7940001421202.

Apple further responds that at least the following baseband chips are included in the  
Accused Products in the United States:

<b><u>Product</u></b>	<b><u>Baseband Chip</u></b>
iPhone	[REDACTED]
iPhone 3G	[REDACTED]
iPhone 3GS	[REDACTED]
iPhone 4 AT&T	[REDACTED]
iPad 1	[REDACTED]
iPad 1 3G	[REDACTED]
iPad 2	[REDACTED]
iPad 2 3G AT&T	[REDACTED]

**Interrogatory No. 20**

Separately for each APPLE ACCUSED PRODUCT and each Baseband Processor,  
IDENTIFY the Software or portions of Software (including corresponding file name and line  
numbers) for performing multiplexing, channel coding, interleaving, demultiplexing of radio  
frames, generating scrambling codes and/or rate matching, or state which of these functions are  
not performed by the APPLE ACCUSED PRODUCT or Baseband Processor.

**Response to Interrogatory No. 20**

Apple objects to this Interrogatory on the grounds that it is overbroad, unduly  
burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.