

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

**EXHIBIT 13**

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November 23, 2011

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**Re: *Certain Electronic Digital Media Devices and Components Thereof, Inv. No. 337-TA-796***

Dear David and Reginald:

Enclosed, please find a hard drive containing Complainant Apple Inc.'s tenth document production in the above-captioned investigation. This production bears the Bates ranges APL-ITC796-0000257177 - APL-ITC796-0000360738 and APLPROS-ITC796-0000000001 - 0000004186.

Please note that the enclosed production contains documents labeled "CONTAINS APPLE CONFIDENTIAL BUSINESS INFORMATION, SUBJECT TO PROTECTIVE ORDER" and should be handled accordingly. Please also note that the enclosed CD has been encrypted. The password will be sent under separate cover.

Sincerely,



Tom E. Beyer

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

APPLE INC. and NeXT SOFTWARE,  
INC. (f/k/a NeXT COMPUTER, INC.),

Plaintiffs,

vs. No. 10-CV-662-BBC

MOTOROLA, INC. and MOTOROLA  
MOBILITY, INC.,  
Defendants.

RELATED CROSS-ACTION.

VIDEOTAPED CONFIDENTIAL DEPOSITION OF ANDRE BOULE  
Redwood Shores, California  
Wednesday, October 5, 2011

Reported by:  
PUA'AINA McVAY, CLR  
CSR No. 12868  
JOB No. 171212

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1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN

3  
4 APPLE INC. and NeXT SOFTWARE,  
5 INC. (f/k/a NeXT COMPUTER, INC.),

6 Plaintiffs,

7 vs. No. 10-CV-662-BBC

8 MOTOROLA, INC. and MOTOROLA  
9 MOBILITY, INC.,  
10 Defendants.

11 RELATED CROSS-ACTION.

12  
13  
14 Deposition of ANDRE BOULE, taken on  
15 behalf of Defendants, at WEIL GOTSHAL  
16 & MANGES, 201 Redwood Shores Parkway,  
17 Fifth Floor, Redwood Shores,  
18 California, beginning at 9:33 a.m.  
19 and ending at 1:11 p.m. on Wednesday,  
20 October 5, 2011, before PUA McVAY,  
21 Certified Shorthand Reporter No.  
22 12868.  
23  
24  
25

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13 Exhibit 2 Motorola Mobility's Notice of  
14 Deposition of Apple, Inc.  
15 Pursuant to Federal Rule of  
16 Procedure 30(b)(6).

17 Exhibit 3 March 2006 E-mail Chain; 55  
18 745-Apple 10623032 - 10623041

19 Exhibit 4 Team Williamson Document; 66  
20 745-Apple 5189338 - 5189340

21 Exhibit 5 Radar List; 67  
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23 Exhibit 6 1-20-2009 United States Patent 70  
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25 Exhibit 7 1-26-2009 E-mail; 80  
WI-Apple 1632529

**In The Matter Of:**

*Apple*  
*vs.*  
*Motorola*

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*Bas Ordning*  
*August 3, 2011*

---

***CONFIDENTIAL***

**MERRILL CORPORATION**

**LegalLink, Inc.**

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

APPLE INC. and NeXT  
SOFTWARE, INC. (f/k/a NeXT  
COMPUTER, INC.),  
Plaintiffs, No. 10-CV-662-BBC

vs.

MOTOROLA, INC. and MOTOROLA  
MOBILITY, INC.,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF CHRIS BLUMENBERG  
Redwood Shores, California  
Thursday, September 8, 2011

Reported by:  
SUZANNE F. BOSCHETTI  
CSR No. 5111

Job No. 171210

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1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN

3 APPLE INC. and NeXT  
4 SOFTWARE, INC. (f/k/a NeXT  
5 COMPUTER, INC.),  
6 Plaintiffs, No. 10-CV-662-BBC

7 vs.

8 MOTOROLA, INC. and MOTOROLA  
9 MOBILITY, INC.,

10 Defendants.

11  
12  
13  
14  
15 Highly Confidential Videotaped Deposition of  
16 CHRIS BLUMENBERG, taken on behalf of Defendants, at  
17 201 Redwood Shores Parkway, Fifth Floor, Redwood  
18 Shores, California, beginning at 9:38 a.m. and ending  
19 at 12:03 p.m., on Thursday, September 8, 2011, before  
20 SUZANNE F. BOSCHETTI, Certified Shorthand Reporter  
21 No. 5111.

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**In The Matter Of:**

*Apple*  
*vs.*  
*Motorola*

---

*Imran Chaudhri*

*July 29, 2011*

---

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1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN

3 APPLE INC. and NeXT SOFTWARE,  
4 INC. (f/k/a NeXT COMPUTER, INC.),

5 Plaintiffs,

6 vs. No. 10-CV-662-BBC

7 MOTOROLA, INC. and MOTOROLA  
8 MOBILITY, INC.,  
9 Defendants.

10 \_\_\_\_\_  
11 RELATED CROSS-ACTION.

12 \_\_\_\_\_

13 VIDEOTAPED CONFIDENTIAL DEPOSITION OF NITIN GANATRA  
14 Redwood Shores, California  
15 Friday, September 23, 2011

16

17 Reported by:  
18 PUA'AINA McVAY, CLR  
19 CSR No. 12868  
20 JOB No. 172834

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24 RAY TYLER, Videographer  
25 SIBRINA KHAN, Quinn Emanuel  
LISA MARIE SCHULL, Apple

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1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN

3 APPLE INC. and NeXT SOFTWARE,  
4 INC. (f/k/a NeXT COMPUTER, INC.),

5 Plaintiffs,

6 vs. No. 10-CV-662-BBC

7 MOTOROLA, INC. and MOTOROLA  
8 MOBILITY, INC.,  
9 Defendants.

10 \_\_\_\_\_  
11 RELATED CROSS-ACTION.

12 \_\_\_\_\_

13

14 Deposition of NITIN GANATRA, taken  
15 on behalf of Defendants, at WEIL  
16 GOTSHAL & MANGES, 201 Redwood Shores  
17 Parkway, Fifth Floor, Redwood Shores,  
18 California, beginning at 9:38 a.m.  
19 and ending at 12:15 p.m. on Friday,  
20 September 23, 2011, before PUA McVAY,  
21 Certified Shorthand Reporter No.  
22 12868.

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2 WITNESS EXAMINATION

3 NITIN GANATRA

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10 EXHIBITS

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14 Exhibit 2 United States Patent US 7,479,949 66

15 Exhibit 3 Utility Patent Application Transmittal: WI-Apple0002394 - 3696 80

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18 Exhibit 5 Thursday December 14 Presentation; WI-Apple1709090 - 1709098 89

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20 Exhibit 6 12-21-2006 Scott Bongiorno; WI-Apple1709099 - 1709101 90

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

APPLE INC. And NeXT SOFTWARE,  
INC. (F/k/a NeXT COMPUTER,  
INC.),

Plaintiffs,

Case No. 10-CV-662-BBC

vs.

MOTOROLA, INC. And MOTOROLA  
MOBILITY, INC.,

Defendants.

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VIDEOTAPED CONFIDENTIAL DEPOSITION OF RICHARD LUTTON

VOLUME I

April 1, 2011

9:57 a.m.

555 Twin Dolphin Drive, Fifth Floor

Redwood Shores, California

REPORTED BY:

Pua McVay, CSR No. 12868

**U.S. Legal Support  
888-575-3376**



1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN  
3  
4 APPLE INC. and NeXT SOFTWARE, INC.  
(f/k/a NeXT COMPUTER, INC.),  
5  
6 Plaintiffs,  
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8 vs. No. 10-CV-662-BBC  
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10 MOTOROLA, INC. and  
11 MOTOROLA MOBILITY, INC.,  
12 Defendants.  
13  
14 RELATED CROSS-ACTION.  
15  
16  
17 CONFIDENTIAL VIDEOTAPED DEPOSITION OF SCOTT HERZ  
18 Redwood Shores, California  
19 Friday, August 19, 2011  
20  
21 Reported by:  
22 PUA'AINA McVAY, CLR  
23 CSR No. 12868  
24 JOB No. 169916  
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1 UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WISCONSIN  
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14 RELATED CROSS-ACTION.  
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17 Deposition of SCOTT HERZ, taken  
18 on behalf of Defendants, at WEIL  
19 GOTSHAL & MANGES, 201 Redwood Shores  
20 Parkway, Fifth Floor, Redwood Shores,  
21 California, beginning at 9:13 a.m. and  
22 ending at 2:08 p.m. on Friday, August  
23 19, 2011, before PUA'AINA McVAY,  
24 Certified Shorthand Reporter No. 12868.  
25

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15 Exhibit 3 10-12-2005 Henri Lamiroux; 44  
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17 Exhibit 4 Multi-Touch USPTO Technology 105  
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19 Exhibit 5 United States Patent 7,479,949 B2 123  
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21 Exhibit 6 Hand Tracking, Finger 161  
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