

EXHIBIT 22

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13 Attorneys for SAMSUNG ELECTRONICS
CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.
25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S SIXTH SET OF REQUESTS
FOR PRODUCTION TO APPLE INC.**

1 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants and
2 Counterclaimants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and
3 Samsung Telecommunications America, LLC (collectively “Samsung”) request that Plaintiff and
4 Counterclaim Defendant Apple Inc. (“Apple”) produce for inspection and copying the documents
5 and things set forth below at the offices of Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin
6 Dolphin Drive, 5th Floor, Redwood Shores, California 94065 within 30 days, or such other time as
7 the parties agree or the Court orders.

8 **DEFINITIONS**

9 The requests for production, as well as the Instructions provided above, are subject to and
10 incorporate the following definitions and instructions as used herein:

11 1. The terms “APPLE,” “PLAINTIFF,” “YOU,” and “YOUR” shall refer to Apple,
12 Inc., any predecessor or successor of Apple, Inc., and any past or present parent, division,
13 subsidiary, affiliate, joint venture, associated organization, director, officer, agent, employee,
14 consultant, staff member, or other representative of Apple, Inc., including counsel and patent
15 agents, in any country.

16 2. The term “DEFENDANTS” and “SAMSUNG” means Samsung Electronics Co.,
17 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

18 3. “This Lawsuit” shall mean the action entitled *Apple, Inc. v. Samsung Electronics*
19 *Co., Ltd.*, Case No. 11-cv-01846-LHK.

20 4. The term “‘604 PATENT” shall mean U.S. Patent No. 6,928,604 and all parents,
21 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
22 and all foreign counterpart applications and patents which claim the same subject matter.

23 5. The term “‘410 PATENT” shall mean U.S. Patent No. 7,050,410 and all parents,
24 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
25 and all foreign counterpart applications and patents which claim the same subject matter.

26 6. The term “‘792 PATENT” shall mean U.S. Patent No. 7,200,792 and all parents,
27 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
28

1 and all foreign counterpart applications and patents which claim the same subject matter.

2 7. The term “‘867 PATENT” shall mean U.S. Patent No. 7,362,867 and all parents,
3 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
4 and all foreign counterpart applications and patents which claim the same subject matter.

5 8. The term “‘001 PATENT” shall mean U.S. Patent No. 7,386,001 and all parents,
6 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
7 and all foreign counterpart applications and patents which claim the same subject matter.

8 9. The term “‘516 PATENT” shall mean U.S. Patent No. 7,447,516 and all parents,
9 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
10 and all foreign counterpart applications and patents which claim the same subject matter.

11 10. The term “‘941 PATENT” shall mean U.S. Patent No. 7,675,941 and all parents,
12 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
13 and all foreign counterpart applications and patents which claim the same subject matter.

14 11. The term “‘055 PATENT” shall mean U.S. Patent No. 7,069,055 and all parents,
15 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
16 and all foreign counterpart applications and patents which claim the same subject matter.

17 12. The term “‘871 PATENT” shall mean U.S. Patent No. 7,079,871 and all parents,
18 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
19 and all foreign counterpart applications and patents which claim the same subject matter.

20 13. The term “‘893 PATENT” shall mean U.S. Patent No. 7,456,893 and all parents,
21 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
22 and all foreign counterpart applications and patents which claim the same subject matter.

23 14. The term “‘460 PATENT” shall mean U.S. Patent No. 7,577,460 and all parents,
24 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
25 and all foreign counterpart applications and patents which claim the same subject matter.

26 15. The term “‘711 PATENT” shall mean U.S. Patent No. 7,698,711 and all parents,
27 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
28 and all foreign counterpart applications and patents which claim the same subject matter.

1 16. “SAMSUNG PATENTS-IN-SUIT” shall mean the ‘604 PATENT, the ‘410
2 PATENT, the ‘792 PATENT, the ‘867 PATENT, the ‘001 PATENT, the ‘516 PATENT, the ‘941
3 PATENT, the ‘055 PATENT, the ‘871 PATENT, the ‘893 PATENT, the ‘460 PATENT, and the
4 ‘711 PATENT.

5 17. The term “‘002 PATENT” shall mean U.S. Patent No. 6,493,002 and all parents,
6 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
7 and all foreign counterpart applications and patents which claim the same subject matter.

8 18. The term “‘381 PATENT” shall mean U.S. Patent No. 7,469,381 and all parents,
9 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
10 and all foreign counterpart applications and patents which claim the same subject matter.

11 19. The term “‘607 PATENT” shall mean U.S. Patent No. 7,663,607 and all parents,
12 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
13 and all foreign counterpart applications and patents which claim the same subject matter.

14 20. The term “‘828 PATENT” shall mean U.S. Patent No. 7,812,828 and all parents,
15 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
16 and all foreign counterpart applications and patents which claim the same subject matter.

17 21. The term “‘915 PATENT” shall mean U.S. Patent No. 7,844,915 and all parents,
18 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
19 and all foreign counterpart applications and patents which claim the same subject matter.

20 22. The term “‘891 PATENT” shall mean U.S. Patent No. 7,853,891 and all parents,
21 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
22 and all foreign counterpart applications and patents which claim the same subject matter.

23 23. The term “‘163 PATENT” shall mean U.S. Patent No. 7,864,163 and all parents,
24 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
25 and all foreign counterpart applications and patents which claim the same subject matter.

26 24. The term “‘129 PATENT” shall mean U.S. Patent No. 7,920,129 and all parents,
27 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
28 and all foreign counterpart applications and patents which claim the same subject matter.

1 25. “APPLE UTILITY PATENTS” shall mean the ‘002 PATENT, the ‘381 PATENT,
2 the ‘607 PATENT, the ‘828 PATENT, the ‘915 PATENT, the ‘891 PATENT, the ‘163 PATENT,
3 and the ‘129 PATENT.

4 26. The term ““D790 PATENT” shall mean U.S. Design Patent No. D627,790 and all
5 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
6 thereof and all foreign counterpart applications, registrations, and patents which claim the same
7 subject matter.

8 27. The term ““D334 PATENT” shall mean U.S. Design Patent No. D617,334 and all
9 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
10 thereof and all foreign counterpart applications, registrations, and patents which claim the same
11 subject matter.

12 28. The term ““D305 PATENT” shall mean U.S. Design Patent No. D604,305 and all
13 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
14 thereof and all foreign counterpart applications, registrations, and patents which claim the same
15 subject matter.

16 29. The term ““D087 PATENT” shall mean U.S. Design Patent No. D593,087 and all
17 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
18 thereof and all foreign counterpart applications, registrations, and patents which claim the same
19 subject matter.

20 30. The term ““D677 PATENT” shall mean U.S. Design Patent No. D618,677 and all
21 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
22 thereof and all foreign counterpart applications, registrations, and patents which claim the same
23 subject matter.

24 31. The term ““D270 PATENT” shall mean U.S. Design Patent No. D622,270 and all
25 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
26 thereof and all foreign counterpart applications, registrations, and patents which claim the same
27 subject matter.

28 32. The term ““D889 PATENT” shall mean U.S. Design Patent No. D504,889 and all

1 parents, progeny, continuations, applications, divisional applications, reexaminations, or reissues
2 thereof and all foreign counterpart applications, registrations, and patents which claim the same
3 subject matter.

4 33. “APPLE DESIGN PATENTS” shall mean the ‘D790 PATENT, the ‘D334
5 PATENT, the ‘D305 PATENT, the ‘D087 PATENT, the ‘D677 PATENT, the ‘D270 PATENT,
6 and the ‘D889 PATENT.

7 34. “APPLE PATENTS-IN-SUIT” shall mean the APPLE UTILITY PATENTS and
8 the APPLE DESIGN PATENTS.

9 35. The term “APPLE TRADE DRESS” shall mean U.S. Registration Nos. 3,470,983;
10 3,457,218; 3,475,327; US Application Serial Nos. 77/921,838; 77/921,829; 77/921,869;
11 85/299,118; and all parents, progeny, continuations, applications, divisional applications,
12 reexaminations, or reissues thereof and all foreign counterpart applications, registrations, and
13 which claim the same subject matter, and the unregistered iPhone, iPhone 3G, iPhone 4,
14 iPhone/iPhone 3G/iPhone 4, iPad, iPad 2, and packaging trade dress claimed by Apple.

15 36. The term “APPLE TRADEMARKS” shall mean U.S. Trademark Registration Nos.
16 3,886,196; 3,889,642; 3,886,200; 3,889,685; 3,886,169; 3,886,197; 2,935,038; U.S. Application
17 Serial No. 85/041,463, and all parents, progeny, continuations, applications, divisional
18 applications, reexaminations, or reissues thereof and all foreign counterpart applications,
19 registrations, and which claim the same subject matter.

20 37. “APPLE IP” shall mean the APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS
21 and APPLE TRADEMARKS.

22 38. The term “APPLE ACCUSED PRODUCTS” shall mean electronic devices that
23 allow for communications and data transfer over networks including establishing data
24 connections, execution of user operations and audio play back of digital data that are
25 manufactured, distributed, and/or sold by You or Your parent, subsidiary, or affiliate companies or
26 on Your behalf, or on behalf of Your parent, subsidiary, or affiliate companies anywhere in the
27 world, at any time between April 15, 2005 through the pendency of This Lawsuit, including each
28 and every Apple product that Samsung has identified as infringing in any of its complaints or

1 infringement contentions served in this action. The term shall include, without limitation, the
2 following devices: the Apple iPhone, the Apple iPhone 3G, the Apple iPhone 3GS, the Apple
3 iPhone 4, the iPod Touch, the iPad, the iPad 3G, the iPad 2, the iPad 2 3G.

4 39. The term “SAMSUNG ACCUSED PRODUCTS” shall mean the products Apple
5 alleges infringe, dilute, unfairly compete with, or otherwise violate Apple’s rights in any of the
6 APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS, or APPLE TRADEMARKS, including,
7 without limitation, the Acclaim, Captivate, Continuum, Droid Charge, Exhibit 4G, Epic 4G,
8 Fascinate, Gem, Galaxy Ace, Galaxy Prevail, Galaxy S, Galaxy S i9000, Galaxy S 4G, Gravity,
9 Indulge, Infuse 4G, Intercept, Mesmerize, Nexus S, Nexus S 4G, Replenish, Showcase i500,
10 Showcase Galaxy S, Sidekick, Transform, and Vibrant phones, and Galaxy Tab and Galaxy Tab
11 10.1 tablet computers.

12 40. The term “Software” shall include source code, hardware code, machine code,
13 assembly code, or code written in any programming language, and code that can be compiled or
14 acted upon by a processor, any listings or printouts thereof, and any release notes describing the
15 features or modifications of such code.

16 41. The term “3GPP” shall mean the organization known as the 3rd Generation
17 Partnership Project which specifies, develops, and promulgates technical specifications for
18 wireless networks.

19 42. The term “UMTS” shall mean the Universal Mobile Telecommunications System
20 as developed and promulgated by 3GPP.

21 43. The term “STANFORD” shall refer the Leland Stanford Junior University, any
22 predecessor or successor of the Leland Stanford Junior University, and any past or present parent,
23 division, subsidiary, affiliate, joint venture, associated organization, director, officer, agent,
24 employee, consultant, staff member, or other representative of the Leland Stanford Junior
25 University, including the Stanford University Libraries.

26 44. The term “STANFORD ARCHIVE” shall refer to all DOCUMENTS and things
27 transferred from YOU to STANFORD between 1996 and the present and ever in the possession of
28 STANFORD, including, but not limited to, all DOCUMENTS and things contained in Special

1 Collections M1007 of the Stanford University Libraries.

2 45. The term “ETSI” shall mean the European Telecommunications Standards
3 Institute.

4 46. The term "ETSI IPR POLICY" shall mean the ETSI Intellectual Property Rights
5 Policy.

6 47. The term “ESSENTIAL IPR” shall have the meaning used in the ETSI Intellectual
7 Property Rights Policy.

8 48. The term "ESSENTIAL" shall have the same meaning as used in the ETSI IPR
9 Policy.

10 49. The term “DECLARED-ESSENTIAL PATENTS” shall mean ESSENTIAL IPR
11 which has been declared essential by ETSI.

12 50. The term “FRAND” shall mean fair, reasonable, and non-discriminatory.

13 51. The term “PATENT FAMILY TREE” shall mean any U.S. or foreign patents or
14 patent applications related to a patent, including all parent, divisional, continuation, continuation-
15 part, reissue, reexamination, extension, and foreign counterpart patents and applications thereof.

16 52. TECHNOLOGICAL NEXUS is defined as in the Court’s December 22, 2011
17 Order (Dkt. No. 536): “prior cases involving the patents-in-suit or patents covering the same or
18 similar technologies, features, or designs as the patents-in-suit ... [W]ith respect to design patent
19 inventors, this would include prior cases involving the asserted design patents or other design
20 patents covering the same designs or design elements. With respect to utility patent inventors, this
21 would include the asserted utility patents or other utility patents covering touchbased interface
22 functions, display elements, touch-screen hardware, or touch-screen logic.”

23 53. The terms “COMMUNICATION” or “COMMUNICATIONS” shall mean, without
24 limitation, any transmittal, conveyance or exchange of a word, statement, fact, thing, idea,
25 Document, instruction, information, demand, question or other information by any medium,
26 whether by written, oral or other means, including but not limited to electronic communications
27 and electronic mail.

28 54. The terms “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning

1 ascribed to it by Federal Rule of Civil Procedure 34 and Federal Rule of Evidence 1001. The term
2 shall include within its meaning, by way of example and not limitation, any and all accounts,
3 analyses, books, CDs, calendars, commercial paper, communications, correspondence, DVDs, e-
4 mail, films, financial statements, floppy disks, hard disks, inter-office memoranda, intangible
5 things, invoices, ledgers, letters, licenses, logs, memoranda, microfilms, minutes, notes, notes of
6 conversations, notes of meetings, notes of telephone calls, office communications, photographs,
7 printouts, recordings of conversations (whether written or electronic), reports, schedules, storage
8 tape, task lists, telegrams, telephone bills, videotapes or other video recordings, and any differing
9 versions of the foregoing whether denominated formal, informal or otherwise, as well as copies of
10 the foregoing which differ from the original in any way, including handwritten notations or other
11 written or printed matter. The foregoing specifically includes information stored electronically,
12 whether in a computer database or otherwise, regardless of whether such documents are presently
13 in documentary form or not. A draft or non-identical copy of a Document is a separate Document
14 within the meaning of this term.

15 55. "Identify" when used in reference to:

16 (1) An individual, means to state his or her full name, present or last known residential
17 and business addresses, present or last known position and business affiliation, and if applicable,
18 history of employment of that individual;

19 (2) A firm, partnership, corporation, proprietorship, joint venture, association, or other
20 organization or entity, means to state its full name, present or last known address and place of
21 incorporation or formation and to identify each agent that acted for it with respect to the matters
22 relating to the request or answer;

23 (3) A DOCUMENT, means to state the date, title, if any, subject matter, each author,
24 each addressee or recipient if practicable, and otherwise a general description of the persons to
25 whom the writing was distributed, the production number, and the type of document, *i.e.*,
26 publication, letter, memorandum, book, telegram, chart etc., or some other means of identifying
27 the document, and its present location and custodian;

28 (4) A COMMUNICATION, means to state its date and place, the person(s) who

1 participated in it or who were present during any part of it or who have knowledge about it;

2 (5) A date, means to state the date and set forth the basis for Your contention that the
3 date is responsive to the request; and

4 (6) A product, service, or intellectual property, means to state all names and numbers
5 related to the product, service, or intellectual property, and the owner, manufacturer, distributor,
6 licensor, or dealer of the product, service, or intellectual property during the relevant time period
7 and currently. For a product, provide all designations for the product, from the most specific to
8 the most general, including any model numbers or designations, version numbers or designations,
9 and internal numbers or designations.

10 56. The term “person” or “persons” refers to any individual, corporation,
11 proprietorship, association, joint venture, company, partnership or other business or legal entity,
12 including governmental bodies and agencies. The masculine includes the feminine and vice versa;
13 the singular includes the plural and vice versa.

14 57. The terms “any,” “all,” “every,” and “each” shall each mean and include the other
15 as necessary to bring within the scope of these requests for production all responses that might
16 otherwise be construed to be outside of their scope.

17 58. The terms “and,” “or,” and “and/or” shall be construed either disjunctively or
18 conjunctively as necessary to bring within the scope of these requests for production all responses
19 that might otherwise be construed to be outside of its scope.

20 59. The term “thing” refers to any physical specimen or tangible item in Your
21 possession, custody or control, including research and development samples, prototypes,
22 productions samples and the like.

23 60. The terms “referring to,” “relating to,” “concerning” or “regarding” shall mean
24 containing, describing, discussing, embodying, commenting upon, identifying, incorporating,
25 summarizing, constituting, comprising or are otherwise pertinent to the matter or any aspect
26 thereof.

27 61. The use of the singular form of any word includes the plural and vice versa, as
28 necessary to bring within the scope of these requests for production all responses that might

1 otherwise be construed to be outside of its scope.

2 62. The use of a verb in any tense shall be construed as the use of the verb in all other
3 tenses.

4 **INSTRUCTIONS**

5 1. Each DOCUMENT is to be produced along with all non-identical drafts thereof in
6 their entirety, without abbreviation or redaction.

7 2. All DOCUMENTS shall be produced in the order that they are kept in the usual
8 course of business, and shall be produced in their original folders, binders, covers or containers, or
9 photocopies thereof.

10 3. In the event that any DOCUMENT called for by these requests or subsequent
11 requests is to be withheld on the basis of a claim of privilege or immunity from discovery, that
12 DOCUMENT is to be identified by stating (i) the author(s), addressee(s) and any indicated or
13 blind copyee(s); (ii) the DOCUMENT's date, number of pages and attachments or appendices;
14 (iii) the subject matter(s) of the DOCUMENT; (iv) the nature of the privilege or immunity
15 asserted; and (v) any additional facts on which you would base your claim of privilege or
16 immunity.¹

17 4. These Requests for Production shall be deemed continuing so as to require further
18 and supplemental production in accordance with the Federal Rules of Civil Procedure.

19 5. State, for each request, whether or not there exist any DOCUMENTS within the
20 scope of the request and whether any such DOCUMENTS are in Your possession, custody, or
21 control.

22 6. Any response made by reference to DOCUMENTS shall identify by document
23 production number each responsive DOCUMENT.

24 7. All DOCUMENTS that respond, in whole or in part, to any portion of any request
25 shall be produced in their entirety, including all attachments and enclosures.
26

27 _____
28 ¹ Per the parties' agreement, neither party needs to log documents and information generated
after the start of this Lawsuit on April 15, 2011.

1 8. Color copies of DOCUMENTS are to be produced where color is necessary to
2 interpret or understand the contents.

3 9. The source(s) or derivation of each DOCUMENT produced shall be specifically
4 identified.

5 10. In the event that any DOCUMENT called for by these requests or subsequent
6 requests has been destroyed or discarded, that DOCUMENT is to be identified by stating: (i) the
7 author(s), addressee(s) and any indicated or blind copyee(s); (ii) the DOCUMENT's date, number
8 of pages and attachments or appendices; (iii) the DOCUMENT's subject matter; (iv) the date of
9 destruction or discard, manner of destruction or discard, and reason for destruction or discard; (v)
10 the persons who were authorized to carry out such destruction or discard; and (vi) whether any
11 copies of the DOCUMENT presently exist and, if so, the name of the custodian of each copy.

12 11. Electronic records and computerized information must be produced in their native
13 electronic format, together with a description of the system from which they were derived
14 sufficient to permit rendering the records and information intelligible.

15 12. If Your response to a particular request for production is a statement that You lack
16 the ability to comply with that request, You must specify whether the inability to comply is
17 because the particular item or category of information never existed, has been destroyed, has been
18 lost, misplaced, or stolen, or has never been, or is no longer, in Your possession, custody, or
19 control, in which case the name and address of any person or entity known or believed by You to
20 have possession, custody, or control of that information or category of information must be
21 identified.

22 13. Unless otherwise indicated in a particular request, the request is not date or time
23 limited.

24 14. Where an identified DOCUMENT is in a language other than English, state
25 whether an English translation of such document exists. If a DOCUMENT is in a language other
26 than English and an English translation exists, identify and provide both DOCUMENTS.

27 15. If possible, supply all financial data requested on a calendar year basis. If fiscal
28 year data is provided, please specify the dates on which the fiscal years begin and end.

1 16. For any information requested that is not readily available from Your records in the
2 form requested, furnish carefully prepared estimates, designated as such. Attach a statement of the
3 basis for such estimates and identify the person or persons making them.

4 17. If any document or portion thereof responsive to a request for production is
5 withheld because You claim it contains privileged information, then separately for each withheld
6 portion of such document, identify (a) the date of the COMMUNICATION and/or DOCUMENT;
7 (b) the source of the information, including the names, titles, and addresses of the DOCUMENT's
8 or COMMUNICATION's authors; (c) the names, titles, and addresses of its recipients; (d) a
9 description of the information withheld; (e) the number of pages; (f) the nature of the privilege
10 claimed and facts upon which You rely to support the claim of privilege; and (g) the number(s) of
11 the request(s) for production to which the DOCUMENT is responsive. You must provide this
12 information within 10 days of the date on which the answers and objections to these requests are
13 due.

14 18. If any DOCUMENTS responsive to any of these requests have been destroyed,
15 then separately for each such document, identify when, why, and by whom it was destroyed, the
16 person or persons who destroyed it, why it was destroyed, and the circumstances under which it
17 was destroyed.

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1 **REQUESTS FOR PRODUCTION**

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3 **REQUEST FOR PRODUCTION NO. 365:**

4 All DOCUMENTS CONCERNING calculations, analyses, considerations, or estimates of
5 the effect of sales of APPLE ACCUSED PRODUCTS on the sale of other non-accused APPLE
6 products and/or the sale of services provided by or through APPLE, including but not limited to
7 sales from iTunes and sales from APPLE'S App Store.

8
9 **REQUEST FOR PRODUCTION NO. 366:**

10 All DOCUMENTS CONCERNING calculations, analyses, considerations, or estimates of
11 the effect of sales of APPLE ACCUSED PRODUCTS on the profits, revenues, and/or sales of
12 products sold by a third-party for which APPLE receives revenue from the third-party.

13
14 **REQUEST FOR PRODUCTION NO. 367:**

15 All DOCUMENTS CONCERNING calculations, analyses, considerations, or estimates of
16 the effect of sales of any of the APPLE ACCUSED PRODUCTS on the sale of any of the other
17 APPLE ACCUSED PRODUCTS.

18
19 **REQUEST FOR PRODUCTION NO. 368:**

20 All DOCUMENTS RELATING TO all studies, including formal or informal analysis,
21 investigation, surveys, focus groups, consumer research, articles, market research reports, or other
22 information relating to the effect of sales of APPLE ACCUSED PRODUCTS on the sale of other
23 non-accused APPLE products and/or the sale of services provided by or through APPLE,
24 including but not limited to sales from iTunes and sales from APPLE's App Store.

25
26 **REQUEST FOR PRODUCTION NO. 369:**

27 All DOCUMENTS RELATING TO all studies, including formal or informal analysis,
28 investigation, surveys, focus groups, consumer research, articles, market research reports, or other

1 information relating to the effect of sales of APPLE ACCUSED PRODUCTS on sales of products
2 sold by a third-party for which APPLE receives revenue from the third-party.

3

4 **REQUEST FOR PRODUCTION NO. 370:**

5 All DOCUMENTS RELATING TO all studies, including formal or informal analysis,
6 investigation, surveys, focus groups, consumer research, articles, market research reports, or other
7 information relating to the effect of sales of any of the APPLE ACCUSED PRODUCTS on the
8 sale of other APPLE ACCUSED PRODUCTS.

9

10 **REQUEST FOR PRODUCTION NO. 371:**

11 All DOCUMENTS REFERRING TO OR RELATING TO consumer preferences
12 regarding mobile phone operating systems, including preferences for the Android operating
13 system over the iOS operating system, and consumer switching between the Android and iOS
14 operating systems.

15

16 **REQUEST FOR PRODUCTION NO. 372:**

17 All DOCUMENTS REFERRING TO OR RELATING TO market share and market share
18 projections for mobile phones based on the operating system employed.

19

20 **REQUEST FOR PRODUCTION NO. 373:**

21 All DOCUMENTS REFERRING TO OR RELATING TO consumer complaints or
22 preferences regarding mobile phone carriers including without limitation any impact of carrier
23 complaints, preferences, or availability on sales of each version of the iPhone.

24

25 **REQUEST FOR PRODUCTION NO. 374:**

26 All research, studies and reports REFERRING TO OR RELATING TO consumer
27 satisfaction or dissatisfaction with each version of the iPhone or iPad including without limitation

28

1 consumer satisfaction or dissatisfaction any aspect of the design of each version of the iPhone or
2 iPad claimed by the APPLE DESIGN PATENTS or APPLE TRADE DRESS.

3
4 **REQUEST FOR PRODUCTION NO. 375:**

5 All research, studies, reports or other DOCUMENTS REFERRING TO OR RELATING
6 TO the impact of any aspect of the design of each version of the iPhone or iPad claimed by the
7 APPLE DESIGN PATENTS or APPLE TRADE DRESS of each version of the iPhone or iPad's
8 sales or consumer preferences or purchasing decisions.

9
10 **REQUEST FOR PRODUCTION NO. 376:**

11 All DOCUMENTS REFERRING TO OR RELATING TO the impact of manufacturing,
12 supply or inventory constraints on sales of each version of the iPhone or iPad.

13
14 **REQUEST FOR PRODUCTION NO. 377:**

15 All research, studies, reports and other DOCUMENTS REFERRING TO OR RELATING
16 TO consumer perceptions of the APPLE brand, changes in consumer perceptions of the APPLE
17 brand and the reasons for such perceptions or changes in perceptions any time from January 1,
18 2006 to the present.

19
20 **REQUEST FOR PRODUCTION NO. 378:**

21 DOCUMENTS sufficient to show on a quarterly and annual basis unit sales and revenue
22 for all versions of the iPhone or iPad by retailer.

23
24 **REQUEST FOR PRODUCTION NO. 379:**

25 DOCUMENTS sufficient to show on a quarterly and annual basis the percent of all sales of
26 each version of the iPhone and iPad in units and revenue made through APPLE online and retail
27 stores.

28

1 **REQUEST FOR PRODUCTION NO. 380:**

2 A sample of each form of contract used by used by mobile phone service providers for the
3 sale of each version of the iPhone.

4
5 **REQUEST FOR PRODUCTION NO. 381:**

6 All studies, reports, summaries or other DOCUMENTS REFERRING TO OR RELATING
7 TO any dropt test or stress test performed in connection with each version of the iPhone or iPad or
8 any prototype of each version of the iPhone or iPad including without limitation the drop testing
9 reports referred to by Christopher Stringer at page 75:16-77:3 of the transcript of his deposition
10 taken November 4, 2011.

11
12 **REQUEST FOR PRODUCTION NO. 382:**

13 All DOCUMENTS REFERRING TO or RELATING TO customer complaints about
14 battery problems for the APPLE ACCUSED PRODUCTS including, but not limited to, any
15 impact on sales, returns, and the APPLE brand.

16
17 **REQUEST FOR PRODUCTION NO. 383:**

18 For any lawsuit or other proceeding involving the APPLE PATENTS-IN-SUIT, involving
19 any patents in the same PATENT FAMILY TREE as the APPLE PATENTS-IN-SUIT, or
20 otherwise having a TECHNOLOGICAL NEXUS with this Lawsuit, all transcripts, declarations,
21 expert reports, claim construction briefs and other DOCUMENTS relating to the construction,
22 scope and/or validity of the APPLE PATENTS-IN-SUIT.

23
24 **REQUEST FOR PRODUCTION NO. 384:**

25 All DOCUMENTS sufficient to show all aliases for SAMSUNG used by APPLE'S design,
26 development, marketing, and finance teams.

27
28

1 **REQUEST FOR PRODUCTION NO. 385:**

2 The monthly surveys of individuals who have recently purchased iPhone or iPad products
3 as referenced in the Reply Declaration of Arthur Rangel in Support of Apple's Motion for a
4 Preliminary Injunction, executed September 30, 2011.

5
6 **REQUEST FOR PRODUCTION NO. 386:**

7 The quarterly reports compiling data collected from monthly surveys of individuals who
8 have recently purchased iPhone and iPad products, including, but not limited to all iPhone Buyer
9 Surveys and all iPad Tracking Studies, referenced in the Reply Declaration of Arthur Rangel in
10 Support of Apple's Motion for a Preliminary Injunction, executed September 30, 2011.

11
12 **REQUEST FOR PRODUCTION NO. 387:**

13 All DOCUMENTS that refute YOUR claims or defenses in THIS LAWSUIT.

14
15 **REQUEST FOR PRODUCTION NO. 388:**

16 For each SAMSUNG product or product packaging that YOU contend infringes any
17 APPLE TRADE DRESS or APPLE TRADEMARK, all DOCUMENTS that support or refute
18 YOUR contention that the SAMSUNG product or product packaging is likely to cause confusion,
19 cause mistake, or deceive consumers as to the affiliation, connection, or association of
20 SAMSUNG with APPLE, or as to origin, sponsorship, or approval by APPLE of SAMSUNG'S
21 goods, services or commercial activities.

22
23 **REQUEST FOR PRODUCTION NO. 389:**

24 All DOCUMENTS REFERRING TO or RELATING TO any relationship between the size
25 of the borders or margins around each version of the iPhone or iPad display screens and
26 protection, reliability or distortion of the display screen, including in the event any version of the
27 iPhone or iPad is dropped.

28

1 **REQUEST FOR PRODUCTION NO. 390:**

2 All DOCUMENTS REFERRING TO or RELATING TO the subject matter of THIS
3 LAWSUIT.

4
5 **REQUEST FOR PRODUCTION NO. 391:**

6 All DOCUMENTS REFERRING TO or RELATING TO the subject matter of any
7 testimony by any deponent in THIS LAWSUIT.

8
9 **REQUEST FOR PRODUCTION NO. 392:**

10 All DOCUMENTS relating to the average number of hours worked per employee at each
11 facility where APPLE products that APPLE contends practice one or more of the APPLE
12 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
13 TRADEMARKS are manufactured and/or assembled.

14
15 **REQUEST FOR PRODUCTION NO. 393:**

16 All DOCUMENTS relating to hiring practices at each facility where APPLE products that
17 APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered by
18 the APPLE TRADE DRESS and/or APPLE TRADEMARKS are manufactured and/or assembled.

19
20 **REQUEST FOR PRODUCTION NO. 394:**

21 All DOCUMENTS relating to employee turn-over at each facility where APPLE products
22 that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered
23 by the APPLE TRADE DRESS and/or APPLE TRADEMARKS are manufactured and/or
24 assembled.

25
26 **REQUEST FOR PRODUCTION NO. 395:**

27 All DOCUMENTS relating to any difficulty with locating and hiring qualified employees
28 at each facility where APPLE products that APPLE contends practice one or more of the APPLE

1 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
2 TRADEMARKS are manufactured and/or assembled.

3
4 **REQUEST FOR PRODUCTION NO. 396:**

5 All DOCUMENTS relating to any difficulty in retaining qualified employees at each
6 facility where APPLE products that APPLE contends practice one or more of the APPLE
7 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
8 TRADEMARKS are manufactured and/or assembled.

9
10 **REQUEST FOR PRODUCTION NO. 397:**

11 All DOCUMENTS relating to the compensation of employees at each facility where
12 APPLE products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT
13 and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS are
14 manufactured and/or assembled, including but not limited to all DOCUMENTS relating to the
15 effect of increased demand for such APPLE products on the compensation requested by
16 employees at each facility where such APPLE products are manufactured and/or assembled.

17
18 **REQUEST FOR PRODUCTION NO. 398:**

19 All DOCUMENTS relating to APPLE's criteria for where to manufacture and/or assemble
20 APPLE products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT
21 and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

22
23 **REQUEST FOR PRODUCTION NO. 399:**

24 All DOCUMENTS relating to APPLE's criteria for selecting companies to manufacture
25 and/or assemble APPLE products that APPLE contends practice one or more of the APPLE
26 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
27 TRADEMARKS.

28

1 **REQUEST FOR PRODUCTION NO. 400:**

2 DOCUMENTS sufficient to show intra-company fees and/or transfer prices associated
3 with any products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT
4 and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

5
6 **REQUEST FOR PRODUCTION NO. 401:**

7 DOCUMENTS sufficient to show the expected, forecasted, or projected sales and
8 profitability of any products that APPLE contends practice one or more of the APPLE PATENTS-
9 IN-SUIT, and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS,
10 prepared before or about the time of the launch of such products.

11
12 **REQUEST FOR PRODUCTION NO. 402:**

13 DOCUMENTS sufficient to show expected returns on investment for any products that
14 APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT, and/or are covered by
15 the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

16
17 **REQUEST FOR PRODUCTION NO. 403:**

18 DOCUMENTS sufficient to show research and development expenditures for any products
19 that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered
20 by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

21
22 **REQUEST FOR PRODUCTION NO. 404:**

23 DOCUMENTS sufficient to show research and development expenditures for the
24 technology claimed by the APPLE PATENTS-IN-SUIT and/or the designs covered by the APPLE
25 TRADE DRESS and/or APPLE TRADEMARKS.

1 **REQUEST FOR PRODUCTION NO. 405:**

2 Quarterly and annual summary DOCUMENTS from which the following may be
3 determined relating to any products that APPLE contends practice one or more of the APPLE
4 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
5 TRADEMARKS:

- 6 a. Total net revenues;
- 7 b. Total quantity of units sold;
- 8 c. Cost of goods sold; and
- 9 d. Operating expenses, including general and administrative expenses and any other
10 allocation of expenses to any products that APPLE contends practice one or more of the APPLE
11 PATENTS-IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE
12 TRADEMARKS.

13
14 **REQUEST FOR PRODUCTION NO. 406:**

15 DOCUMENTS sufficient to show pricing, price setting, changes in pricing, and pricing
16 policies for any products that APPLE contends practice one or more of the APPLE PATENTS-IN-
17 SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

18
19 **REQUEST FOR PRODUCTION NO. 407:**

20 All business plans, marketing plans, strategic plans, operating plans, licensing plans,
21 financial plans, production plans, sales plans, and capital expenditure plans relating to any
22 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are
23 covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

24
25 **REQUEST FOR PRODUCTION NO. 408:**

26 All DOCUMENTS relating to customer profiles or customer buying patterns for customers
27 who have purchased, been solicited to purchase, or have inquired about the purchase of any
28

1 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are
2 covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

3

4 **REQUEST FOR PRODUCTION NO. 409:**

5 All promotional or marketing DOCUMENTS describing the advantages or benefits of any
6 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT, and/or
7 are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS, over other products.

8

9 **REQUEST FOR PRODUCTION NO. 410:**

10 All DOCUMENTS relating to competitive assessments of any products that APPLE
11 contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered by the
12 APPLE TRADE DRESS and/or APPLE TRADEMARKS, including but not limited to
13 comparisons of benefits, functionality, performance, costs, and prices between any products that
14 APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT, and/or are covered by
15 the APPLE TRADE DRESS and/or APPLE TRADEMARKS, and the products of competitors.

16

17 **REQUEST FOR PRODUCTION NO. 411:**

18 All DOCUMENTS relating to historical and projected customer preferences and desired
19 attributes for any products that APPLE contends practice one or more of the APPLE PATENTS-
20 IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

21

22 **REQUEST FOR PRODUCTION NO. 412:**

23 All DOCUMENTS provided by market research firms that relate to or discuss any
24 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are
25 covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

26

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28

1 **REQUEST FOR PRODUCTION NO. 413:**

2 All DOCUMENTS relating to the reasons why customers purchase, or choose not to
3 purchase, any products that APPLE contends practice one or more of the APPLE PATENTS-IN-
4 SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS,
5 including but not limited to competitive market analyses and customer surveys.
6

7 **REQUEST FOR PRODUCTION NO. 414:**

8 All DOCUMENTS, studies, reports, surveys, and articles describing the market for any
9 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are
10 covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS, including but not
11 limited to market segments, the size of actual and potential markets, market growth rates, potential
12 customer bases, the product offerings and pricing of competitors, actual and anticipated market
13 shares, and product sales and profitability.
14

15 **REQUEST FOR PRODUCTION NO. 415:**

16 DOCUMENTS sufficient to show APPLE's manufacturing or supply capacity for any
17 products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are
18 covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.
19

20 **REQUEST FOR PRODUCTION NO. 416:**

21 DOCUMENTS sufficient to show APPLE's marketing and sales capacity for any products
22 that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered
23 by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.
24

25 **REQUEST FOR PRODUCTION NO. 417:**

26 All DOCUMENTS relating to any constraints on APPLE's manufacturing or supply
27 capacity for any products that APPLE contends practice one or more of the APPLE PATENTS-
28 IN-SUIT and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

1 **REQUEST FOR PRODUCTION NO. 418:**

2 All DOCUMENTS relating to any constraints on APPLE's marketing and sales capacity
3 for any products that APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT
4 and/or are covered by the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

5
6 **REQUEST FOR PRODUCTION NO. 419:**

7 DOCUMENTS sufficient to show any supply shortages of any products that APPLE
8 contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered by the
9 APPLE TRADE DRESS and/or APPLE TRADEMARKS.

10

11 **REQUEST FOR PRODUCTION NO. 420:**

12 DOCUMENTS sufficient to show any supply or inventory excesses for any products that
13 APPLE contends practice one or more of the APPLE PATENTS-IN-SUIT and/or are covered by
14 the APPLE TRADE DRESS and/or APPLE TRADEMARKS.

15

16 **REQUEST FOR PRODUCTION NO. 421:**

17 All DOCUMENTS relating to the demand for the technology claimed in the APPLE
18 PATENTS-IN-SUIT and/or the designs covered by the APPLE TRADE DRESS and/or APPLE
19 TRADEMARKS, including but not limited to consumer surveys, consumer focus groups, and
20 comparisons of the benefits, functionality, performance, design, and costs of alternative
21 technologies.

22

23 **REQUEST FOR PRODUCTION NO. 422:**

24 Any intercompany agreement regarding reimbursement of research and development
25 expenses for work in any way related to tablet computers or mobile phones.

26

27

28

1 **REQUEST FOR PRODUCTION NO. 423:**

2 DOCUMENTS sufficient to show APPLE'S accounting practices pertaining to the APPLE
3 ACCUSED PRODUCTS, including but not limited to APPLE'S methods of accounting for
4 revenues, costs and profits, methods of depreciation, allocation of expenses, inventory
5 measurements, profit allocation, losses and assignments of debts, and APPLE'S methods of
6 allocating between United States and worldwide revenue from January 1, 2007 to the present.

7
8 **REQUEST FOR PRODUCTION NO. 424:**

9 All DOCUMENTS discussing the market for smartphones using the Android operating
10 system.

11
12 **REQUEST FOR PRODUCTION NO. 425:**

13 All DOCUMENTS discussing competition between each version of the iPhone and
14 smartphones using the Android operating system.

15
16 **REQUEST FOR PRODUCTION NO. 426:**

17 All DOCUMENTS discussing competition between each version of the iPad and media
18 tablets using the Android operating system.

19
20 **REQUEST FOR PRODUCTION NO. 427:**

21 All DOCUMENTS relating to elasticity, elasticity of demand, or consumer price
22 sensitivity for the APPLE ACCUSED PRODUCTS.

23
24 **REQUEST FOR PRODUCTION NO. 428:**

25 All DOCUMENTS RELATING TO the capacity to manufacture the APPLE ACCUSED
26 PRODUCTS at any point in time.

27
28

1 **REQUEST FOR PRODUCTION NO. 429:**

2 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
3 memory controllers technology from Anobit Technologies used in the APPLE ACCUSED
4 PRODUCTS, including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase
5 price accounting for the acquisition, and any valuations of assets or intellectual property
6 performed by APPLE or a third-party in connection with the acquisition.

7
8 **REQUEST FOR PRODUCTION NO. 430:**

9 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
10 facial recognition technology from Polar Rose used in the APPLE ACCUSED PRODUCTS,
11 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
12 accounting for the acquisition, and any valuations of assets or intellectual property performed by
13 APPLE or a third-party in connection with the acquisition.

14
15 **REQUEST FOR PRODUCTION NO. 431:**

16 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of 3D
17 mapping technology from C3 Technologies used in the APPLE ACCUSED PRODUCTS,
18 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
19 accounting for the acquisition, and any valuations of assets or intellectual property performed by
20 APPLE or a third-party in connection with the acquisition.

21
22 **REQUEST FOR PRODUCTION NO. 432:**

23 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of web
24 mapping technology from Poly9 used in the APPLE ACCUSED PRODUCTS, including the
25 acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price accounting for the
26 acquisition, and any valuations of assets or intellectual property performed by APPLE or a third-
27 party in connection with the acquisition.

28

1 **REQUEST FOR PRODUCTION NO. 433:**

2 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of HDR
3 photography technology from Imsense used in the APPLE ACCUSED PRODUCTS, including the
4 acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price accounting for the
5 acquisition, and any valuations of assets or intellectual property performed by APPLE or a third-
6 party in connection with the acquisition.

7
8 **REQUEST FOR PRODUCTION NO. 434:**

9 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
10 virtual personal assistant technology from Siri, Inc. used in the APPLE ACCUSED PRODUCTS,
11 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
12 accounting for the acquisition, and any valuations of assets or intellectual property performed by
13 APPLE or a third-party in connection with the acquisition.

14
15 **REQUEST FOR PRODUCTION NO. 435:**

16 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
17 microprocessor technology from Intrisity, Inc. used in the APPLE ACCUSED PRODUCTS,
18 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
19 accounting for the acquisition, and any valuations of assets or intellectual property performed by
20 APPLE or a third-party in connection with the acquisition.

21
22 **REQUEST FOR PRODUCTION NO. 436:**

23 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
24 mobile advertising technology from Quattro Wireless, Inc. used in the APPLE ACCUSED
25 PRODUCTS, including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase
26 price accounting for the acquisition, and any valuations of assets or intellectual property
27 performed by APPLE or a third-party in connection with the acquisition.

28

1 **REQUEST FOR PRODUCTION NO. 437:**

2 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
3 streaming music technology from La La Media, Inc. used in the APPLE ACCUSED PRODUCTS,
4 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
5 accounting for the acquisition, and any valuations of assets or intellectual property performed by
6 APPLE or a third-party in connection with the acquisition.

7
8 **REQUEST FOR PRODUCTION NO. 438:**

9 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of web
10 mapping technology from PlaceBase, Inc. used in the APPLE ACCUSED PRODUCTS, including
11 the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price accounting for the
12 acquisition, and any valuations of assets or intellectual property performed by APPLE or a third-
13 party in connection with the acquisition.

14
15 **REQUEST FOR PRODUCTION NO. 439:**

16 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of
17 microprocessor technology from P.A. Semi, Inc. used in the APPLE ACCUSED PRODUCTS,
18 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
19 accounting for the acquisition, and any valuations of assets or intellectual property performed by
20 APPLE or a third-party in connection with the acquisition.

21
22 **REQUEST FOR PRODUCTION NO. 440:**

23 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of asset
24 management SOFTWARE from Proximity used in the APPLE ACCUSED PRODUCTS,
25 including the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price
26 accounting for the acquisition, and any valuations of assets or intellectual property performed by
27 APPLE or a third-party in connection with the acquisition.

28

1 **REQUEST FOR PRODUCTION NO. 441:**

2 All DOCUMENTS, regardless of date, RELATING TO the acquisition by APPLE of color
3 finishing SOFTWARE from Silicon Color used in the APPLE ACCUSED PRODUCTS, including
4 the acquisition agreement, DOCUMENTS reflecting APPLE'S purchase price accounting for the
5 acquisition, and any valuations of assets or intellectual property performed by APPLE or a third-
6 party in connection with the acquisition.

7
8 **REQUEST FOR PRODUCTION NO. 442:**

9 All DOCUMENTS relating to any APPLE request to SAMSUNG for a license to
10 SAMSUNG'S intellectual property on FRAND terms prior to filing THIS LAWSUIT.

11
12 **REQUEST FOR PRODUCTION NO. 443:**

13 All DOCUMENTS RELATING TO how customers value individual features embodied in
14 any of the APPLE ACCUSED PRODUCTS, including any studies, surveys, market analyses, or
15 valuations relating to any features of the APPLE ACCUSED PRODUCTS, regardless of date.

16
17 **REQUEST FOR PRODUCTION NO. 444:**

18 All DOCUMENTS RELATING TO any periodically prepared management reporting
19 packages that pertain to any of the APPLE ACCUSED PRODUCTS.

20
21 **REQUEST FOR PRODUCTION NO. 445:**

22 All licenses, royalty agreements, or settlement agreements, regardless of date, to which
23 YOU are a party to the extent such license, royalty agreement, or settlement agreement covers any
24 portion of the APPLE IP.

25
26 **REQUEST FOR PRODUCTION NO. 446:**

27 All DOCUMENTS RELATING TO how customers value any feature of any APPLE
28 ACCUSED PRODUCT that provides the capability for a user to email an image, including any

1 studies, surveys, market analyses, or valuations relating to such feature of the APPLE ACCUSED
2 PRODUCTS, regardless of date.

3
4 **REQUEST FOR PRODUCTION NO. 447:**

5 All DOCUMENTS RELATING TO how customers value any feature of any APPLE
6 ACCUSED PRODUCT that provides the capability for a user to bookmark in a digital photo
7 album, including any studies, surveys, market analyses, or valuations relating to such feature of
8 the APPLE ACCUSED PRODUCTS, regardless of date.

9
10 **REQUEST FOR PRODUCTION NO. 448:**

11 All DOCUMENTS RELATING TO how customers value any feature of any APPLE
12 ACCUSED PRODUCT that provides split screen message notification functionality, including
13 any studies, surveys, market analyses, or valuations relating to such feature of the APPLE
14 ACCUSED PRODUCTS, regardless of date.

15
16 **REQUEST FOR PRODUCTION NO. 449:**

17 All DOCUMENTS RELATING TO how customers value any feature of any APPLE
18 ACCUSED PRODUCT that provides world clock functionality, including any studies, surveys,
19 market analyses, or valuations relating to such feature of the APPLE ACCUSED PRODUCTS,
20 regardless of date.

21
22 **REQUEST FOR PRODUCTION NO. 450:**

23 All DOCUMENTS RELATING TO how customers value any feature of any APPLE
24 ACCUSED PRODUCT that provides the capability for a user to listen to an MP3 file while
25 performing other tasks on the APPLE ACCUSED PRODUCT, including any studies, surveys,
26 market analyses, or valuations relating to such feature of the APPLE ACCUSED PRODUCTS,
27 regardless of date.

28

1 **REQUEST FOR PRODUCTION NO. 451:**

2 All DOCUMENTS RELATING TO how customers value 3G capability, including any
3 studies, surveys, market analyses, or valuations relating to 3G capability of the APPLE
4 ACCUSED PRODUCTS, regardless of date.

5
6 **REQUEST FOR PRODUCTION NO. 452:**

7 All DOCUMENTS concerning any version (proposed or adopted) of the ETSI IPR
8 POLICY.

9
10 **REQUEST FOR PRODUCTION NO. 453:**

11 All DOCUMENTS concerning APPLE's compliance or lack of compliance with any
12 version of the ETSI IPR POLICY.

13
14 **REQUEST FOR PRODUCTION NO. 454:**

15 All DOCUMENTS reflecting communications between APPLE or someone acting on
16 APPLE's behalf and ETSI or a person acting on ETSI's behalf, concerning any actual or proposed
17 policy, guideline, or rule of ETSI.

18
19 **REQUEST FOR PRODUCTION NO. 455:**

20 All DOCUMENTS concerning the compliance or lack of compliance of entities other than
21 APPLE with respect to any version of the ETSI IPR POLICY.

22
23 **REQUEST FOR PRODUCTION NO. 456:**

24 All DOCUMENTS concerning the requirement that ETSI members use reasonable
25 endeavors to inform ETSI of ESSENTIAL IPR in a timely fashion.

26
27
28

1 **REQUEST FOR PRODUCTION NO. 457:**

2 All DOCUMENTS concerning the meaning of ‘timely’ as that term is used in Section 4.1
3 of the ETSI IPR POLICY.

4

5 **REQUEST FOR PRODUCTION NO. 458:**

6 All DOCUMENTS concerning any actual or proposed prohibition against ETSI members
7 seeking injunctions to prevent infringement of ESSENTIAL IPR.

8

9 **REQUEST FOR PRODUCTION NO. 459:**

10 All DOCUMENTS concerning the respective activities and responsibilities of Apple UK
11 and Apple Inc. with respect to APPLE's participation in ETSI.

12

13 **REQUEST FOR PRODUCTION NO. 460:**

14 All DOCUMENTS concerning any contribution by APPLE to any ETSI standard or
15 technical specification between November 18, 1997 and the present.

16

17 **REQUEST FOR PRODUCTION NO. 461:**

18 All documents concerning any contribution by APPLE to any ETSI standard or technical
19 specification between November 18, 1997 and the present.

20

21 **REQUEST FOR PRODUCTION NO. 462:**

22 All DOCUMENTS concerning any participation by APPLE in 3GPP Working Group 1
23 between November 18, 1997 and the present.

24

25 **REQUEST FOR PRODUCTION NO. 463:**

26 DOCUMENTS sufficient to show the membership status of APPLE in ETSI between
27 November 18, 1997 and the present.

28

1 **REQUEST FOR PRODUCTION NO. 464:**

2 DOCUMENTS sufficient to show the membership status of APPLE UK in ETSI between
3 November 18, 1997 and the present.

4
5 **REQUEST FOR PRODUCTION NO. 465:**

6 All DOCUMENTS concerning any breach by APPLE of the ETSI IPR Policy between
7 November 18, 1997 and the present.

8
9 **REQUEST FOR PRODUCTION NO. 466:**

10 All DOCUMENTS concerning any statements made, complaints made, or other actions
11 taken by APPLE at ETSI in response to SAMSUNG's alleged breach of the ETSI IPR Policy.

12
13 **REQUEST FOR PRODUCTION NO. 467:**

14 All DOCUMENTS concerning any statements made, complaints made, or other actions
15 taken by APPLE at ETSI in response to SAMSUNG's alleged failure to timely disclose any
16 ESSENTIAL IPR, including one or more of the ESSENTIAL SAMSUNG patents.

17
18 **REQUEST FOR PRODUCTION NO. 468:**

19 All DOCUMENTS concerning SAMSUNG'S ESSENTIAL IPR from 1995 to the present.

20
21 **REQUEST FOR PRODUCTION NO. 469:**

22 All DOCUMENTS pertaining to APPLE's revenue forecasts from the sale of each of the
23 APPLE ACCUSED PRODUCTS to customers in the U.S.

24
25 **REQUEST FOR PRODUCTION NO. 470:**

26 All DOCUMENTS concerning APPLE's determination of the size of the market in the
27 U.S. for each APPLE ACCUSED PRODUCT and APPLE's share of the market in terms of
28 market capitalization and percentage of the market.

1 **REQUEST FOR PRODUCTION NO. 471:**

2 All DOCUMENTS concerning the July 2007 IPR information Statement and Licensing
3 Declaration (see ITC-003126935 – S-ITC-003126941) filed by Apple Inc. with ETSI.
4

5 **REQUEST FOR PRODUCTION NO. 472:**

6 All DOCUMENTS concerning the November 2011 IPR Information Statement and
7 Licensing Declaration (see S-ITC-003126942 – S-ITC-003126968) filed by Apple Inc. with ETSI.
8

9 **REQUEST FOR PRODUCTION NO. 473:**

10 All DOCUMENTS concerning APPLE’s understanding of ESSENTIAL IPR pertaining to
11 ETSI Technical Specification, ETSI TS 123 060 V5.7.0 (see S-ITC-003127332 – S-ITC-
12 003127543).
13

14 **REQUEST FOR PRODUCTION NO. 474:**

15 All DOCUMENTS concerning APPLE’s understanding of ESSENTIAL IPR pertaining to
16 3GPP TS 23.060 Release 5.
17

18 **REQUEST FOR PRODUCTION NO. 475:**

19 All DOCUMENTS that refer or relate to the STANFORD ARCHIVE.
20

21 **REQUEST FOR PRODUCTION NO. 476:**

22 All DOCUMENTS that refer or relate to the establishment of the STANFORD ARCHIVE.
23

24 **REQUEST FOR PRODUCTION NO. 477:**

25 All DOCUMENTS that refer or relate to the ownership of DOCUMENTS and things in the
26 STANFORD ARCHIVE.
27
28

1 **REQUEST FOR PRODUCTION NO. 478:**

2 All contracts, memoranda of understanding, and agreements that refer or relate to the
3 STANFORD ARCHIVE.

4
5 **REQUEST FOR PRODUCTION NO. 479:**

6 All contracts, memoranda of understanding, and agreements that refer or relate to the
7 establishment of the STANFORD ARCHIVE.

8
9 **REQUEST FOR PRODUCTION NO. 480:**

10 All contracts, memoranda of understanding, and agreements that refer or relate to the
11 ownership of DOCUMENTS and things in the STANFORD ARCHIVE.

12
13 **REQUEST FOR PRODUCTION NO. 481:**

14 All contracts, memoranda of understanding, and agreements between YOU and
15 STANFORD between January 1, 1996 and the present that refer or relate to the DOCUMENTS
16 and things contained in the STANFORD ARCHIVE.

17
18 **REQUEST FOR PRODUCTION NO. 482:**

19 All COMMUNICATIONS between YOU and STANFORD between January 1, 1996 and
20 December 31, 1998 that refer or relate to the STANFORD ARCHIVE.

21
22 **REQUEST FOR PRODUCTION NO. 483:**

23 All COMMUNICATIONS between YOU and STANFORD between January 1, 1996 and
24 December 31, 1998 that refer or relate to the establishment of the STANFORD ARCHIVE.

1 **REQUEST FOR PRODUCTION NO. 484:**

2 All COMMUNICATIONS between YOU and STANFORD between January 1, 1996 and
3 December 31, 1998 that refer or relate to the ownership of DOCUMENTS and things in the
4 STANFORD ARCHIVE.

5
6 **REQUEST FOR PRODUCTION NO. 485:**

7 All tax returns and tax DOCUMENTS prepared by YOU or on YOUR behalf between
8 January 1, 1996 and the present that refer or relate to the DOCUMENTS and things contained in
9 the STANFORD ARCHIVE.

10

11 **REQUEST FOR PRODUCTION NO. 486:**

12 All tax returns and tax DOCUMENTS prepared by YOU or on YOUR behalf between
13 January 1, 1996 and the present that refer or relate to the ownership of DOCUMENTS and things
14 contained in the STANFORD ARCHIVE.

15

16 **REQUEST FOR PRODUCTION NO. 487:**

17 All catalogs, registers, records, lists, and other compilations that refer or relate to any
18 DOCUMENT or thing transferred from YOU to STANFORD between January 1, 1996 and the
19 present.

20

21 **REQUEST FOR PRODUCTION NO. 488:**

22 All catalogs, registers, records, lists, and other compilations that itemize or list any
23 DOCUMENT or thing transferred from YOU to STANFORD between January 1, 1996 and the
24 present.

25

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1 **REQUEST FOR PRODUCTION NO. 489:**

2 All catalogs, registers, records, lists, and other compilations that itemize or list any
3 DOCUMENT or thing transferred from YOU to STANFORD between January 1, 1996 to the
4 present for storage in the STANFORD ARCHIVE.

5
6 **REQUEST FOR PRODUCTION NO. 490:**

7 All DOCUMENTS that refer or relate to the storage or maintenance of DOCUMENTS and
8 things contained in the STANFORD ARCHIVE.

9
10 **REQUEST FOR PRODUCTION NO. 491:**

11 All DOCUMENTS that refer or relate to YOUR access to DOCUMENTS or things in the
12 STANFORD ARCHIVE.

13
14 **REQUEST FOR PRODUCTION NO. 492:**

15 All DOCUMENTS that refer or relate to YOUR ability to access or retrieve or borrow
16 DOCUMENTS or things from the STANFORD ARCHIVE.

17
18 **REQUEST FOR PRODUCTION NO. 493:**

19 All DOCUMENTS that refer or relate to any option or ability YOU have to limit access to
20 the STANFORD ARCHIVE.

21
22 **REQUEST FOR PRODUCTION NO. 494:**

23 All DOCUMENTS that refer or relate to the purpose, objective, or the reason for existence
24 of the STANFORD ARCHIVE.

25
26 **REQUEST FOR PRODUCTION NO. 495:**

27 All DOCUMENTS that refer or relate to the reason, objective, or purpose of YOUR
28 transfer of DOCUMENTS and things to STANFORD or the STANFORD ARCHIVE.

1 **REQUEST FOR PRODUCTION NO. 496:**

2 All DOCUMENTS that refer or relate to YOUR rights and privileges with regard to the
3 DOCUMENTS and things in the STANFORD ARCHIVE, including but not limited to, YOUR
4 access to the STANFORD ARCHIVE.

5
6 **REQUEST FOR PRODUCTION NO. 497:**

7 All DOCUMENTS that refer or relate to any payment by YOU to STANFORD in
8 connection with the STANFORD ARCHIVE or DOCUMENTS and things in the STANFORD
9 ARCHIVE.

10
11 **REQUEST FOR PRODUCTION NO. 498:**

12 All DOCUMENTS that refer or relate to the transfer of any DOCUMENT or thing from
13 the STANFORD ARCHIVE to YOU.

14
15 **REQUEST FOR PRODUCTION NO. 499:**

16 All DOCUMENTS that refer or relate to YOUR borrowing or temporary retrieval of any
17 DOCUMENT or thing from the STANFORD ARCHIVE.

18
19 **REQUEST FOR PRODUCTION NO. 500:**

20 DOCUMENTS sufficient to show YOUR ability to locate specific DOCUMENTS or
21 things in the STANFORD ARCHIVE.

22
23 **REQUEST FOR PRODUCTION NO. 501:**

24 DOCUMENTS sufficient to show YOUR ability to locate categories or groups of
25 DOCUMENTS or things in the STANFORD ARCHIVE.

26
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28

1 **REQUEST FOR PRODUCTION NO. 502:**

2 DOCUMENTS sufficient to show STANFORD's ability to locate specific DOCUMENTS
3 or things in the STANFORD ARCHIVE.

4
5 **REQUEST FOR PRODUCTION NO. 503:**

6 DOCUMENTS sufficient to show STANFORD's ability to locate categories or groups of
7 DOCUMENTS or things in the STANFORD ARCHIVE.

8
9 **REQUEST FOR PRODUCTION NO. 504:**

10 All DOCUMENTS REFERRING OR RELATING TO the mobile wireless carrier
11 networks to which each APPLE ACCUSED PRODUCT communicates.

12
13 **REQUEST FOR PRODUCTION NO. 505:**

14 DOCUMENTS sufficient to identify, on a quarterly and annual basis, the purchasers of
15 APPLE ACCUSED PRODUCTS.

16
17 **REQUEST FOR PRODUCTION NO. 506:**

18 For each mobile wireless carrier networks to which APPLE ACCUSED PRODUCT
19 DOCUMENTS are sold, DOCUMENTS sufficient to show, on a quarterly and annual basis, the
20 revenue derived from the sale of each APPLE ACCUSED PRODUCT, the number of units sold,
21 the average sale price, and APPLE's profit from the sale.

22
23 **REQUEST FOR PRODUCTION NO. 507:**

24 For each mobile wireless carrier networks to which APPLE ACCUSED PRODUCT
25 DOCUMENTS are sold, DOCUMENTS sufficient to show, on a quarterly and annual basis, the
26 gross margin in dollars and the gross margin as a percentage of revenue that APPLE has obtained
27 from sales of each APPLE ACCUSED PRODUCT.

28

1 **REQUEST FOR PRODUCTION NO. 508:**

2 For each mobile wireless carrier networks to which APPLE ACCUSED PRODUCT
3 DOCUMENTS are sold, DOCUMENTS sufficient to show, on a quarterly and annual basis, the
4 income (or loss) before interest, taxes, and non-operating expenses, that APPLE has obtained from
5 sales of each APPLE ACCUSED PRODUCT.

6
7 **REQUEST FOR PRODUCTION NO. 509:**

8 For each network on which an APPLE ACCUSED PRODUCT operates, DOCUMENTS
9 sufficient to show, on a quarterly and annual basis, the revenue derived from the sale of each
10 APPLE ACCUSED PRODUCT, the number of units sold, the average sale price, and APPLE's
11 profit from the sale.

12
13 **REQUEST FOR PRODUCTION NO. 510:**

14 For each network on which an APPLE ACCUSED PRODUCT operates, DOCUMENTS
15 sufficient to show, on a quarterly and annual basis, the gross margin in dollars and the gross
16 margin as a percentage of revenue that APPLE has obtained from sales of each APPLE
17 ACCUSED PRODUCT.

18
19 **REQUEST FOR PRODUCTION NO. 511:**

20 For each network on which an APPLE ACCUSED PRODUCT operates, DOCUMENTS
21 sufficient to show, on a quarterly and annual basis, the income (or loss) before interest, taxes, and
22 non-operating expenses, that APPLE has obtained from sales of each APPLE ACCUSED
23 PRODUCT.

24
25 **REQUEST FOR PRODUCTION NO. 512:**

26 For each telecommunications standard with which an APPLE ACCUSED PRODUCT is
27 compliant, DOCUMENTS sufficient to show, on a quarterly and annual basis, the revenue derived
28

1 from the sale of each APPLE ACCUSED PRODUCT, the number of units sold, the average sale
2 price, and APPLE's profit from the sale.

3

4 **REQUEST FOR PRODUCTION NO. 513:**

5 For each telecommunications standard with which an APPLE ACCUSED PRODUCT is
6 compliant, DOCUMENTS sufficient to show, on a quarterly and annual basis, the gross margin in
7 dollars and the gross margin as a percentage of revenue that APPLE has obtained from sales of
8 each APPLE ACCUSED PRODUCT.

9

10 **REQUEST FOR PRODUCTION NO. 514:**

11 For each telecommunications standard with which an APPLE ACCUSED PRODUCT is
12 compliant, DOCUMENTS sufficient to show, on a quarterly and annual basis, the income (or loss)
13 before interest, taxes, and non-operating expenses, that APPLE has obtained from sales of each
14 APPLE ACCUSED PRODUCT.

15

16 **REQUEST FOR PRODUCTION NO. 515:**

17 DOCUMENTS sufficient to show, on a quarterly and annual basis, the percentage of
18 APPLE ACCUSED PRODUCTS that are sold to each mobile wireless carrier.

19

20 **REQUEST FOR PRODUCTION NO. 516:**

21 DOCUMENTS sufficient to show, on a quarterly and annual basis, the percentage of
22 APPLE ACCUSED PRODUCTS that are sold for use with each mobile wireless carrier's
23 network.

24

25 **REQUEST FOR PRODUCTION NO. 517:**

26 DOCUMENTS sufficient to show, on a quarterly and annual basis, the percentage of
27 APPLE ACCUSED PRODUCTS that are compliant with each telecommunications standard.

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1 **REQUEST FOR PRODUCTION NO. 518:**

2 All DOCUMENTS REFERRING OR RELATING TO the subscriber base of each mobile
3 wireless carrier.

4
5 **REQUEST FOR PRODUCTION NO. 519:**

6 All DOCUMENTS REFERRING OR RELATING TO changes in the subscriber base of
7 any mobile wireless carrier.

8
9 **REQUEST FOR PRODUCTION NO. 520:**

10 All DOCUMENTS and things, including but not limited to specifications, CAD files,
11 marketing material, design documents, prototypes, or devices, that relate to or describe the design,
12 structure, components, manufacturer, and/or layout of the touchpads used in APPLE'S
13 PowerBook 500 series, PowerBook 5300, PowerBook 1400, PowerBook 2400, PowerBook 3400,
14 and/or PowerBook G3, that were on sale prior to January 1, 1999.

15
16 **REQUEST FOR PRODUCTION NO. 521:**

17 All DOCUMENTS and things, including but not limited to specifications, CAD files,
18 marketing material, design documents, prototypes, or devices, that relate to or describe the design,
19 structure, components, manufacturer, and/or layout of any touchpads designed by Cirque
20 Corporation and used in APPLE'S PowerBook 500 series, PowerBook 5300, PowerBook 1400,
21 PowerBook 2400, PowerBook 3400, and/or PowerBook G3, that were on sale prior to January 1,
22 1999.

23
24 **REQUEST FOR PRODUCTION NO. 522:**

25 All agendas and other DOCUMENTS prepared in connection with any division meeting
26 for the devices division or the Mac division in which there was any discussion of any version of
27 the iPhone, iPad or iPod Touch.

28

1 **REQUEST FOR PRODUCTION NO. 523:**

2 All DOCUMENTS RELATING TO any training provided to APPLE retail store
3 employees regarding any perceived advantages or disadvantages of the APPLE ACCUSED
4 PRODUCTS as compared to competing products, and/or any differences between the APPLE
5 ACCUSED PRODUCTS and competing products.

6
7 **REQUEST FOR PRODUCTION NO. 524:**

8 All DOCUMENTS RELATING TO any training provided to APPLE retail store
9 employees regarding any perceived advantages or disadvantages of Android devices.

10
11 **REQUEST FOR PRODUCTION NO. 525:**

12 All DOCUMENTS RELATING TO any training provided to APPLE retail store
13 employees regarding any perceived advantages or disadvantages of the SAMSUNG ACCUSED
14 PRODUCTS.

15
16 **REQUEST FOR PRODUCTION NO. 526:**

17 All DOCUMENTS RELATING TO reports from APPLE retail store employees regarding
18 customers' perceptions of the advantages and/or disadvantages of APPLE ACCUSED
19 PRODUCTS.

20
21 **REQUEST FOR PRODUCTION NO. 527:**

22 All DOCUMENTS RELATING TO reports from APPLE retail store employees regarding
23 customers' perceptions of the advantages and/or disadvantages of SAMSUNG ACCUSED
24 PRODUCTS.

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1 **REQUEST FOR PRODUCTION NO. 528:**

2 All DOCUMENTS RELATING TO reports from APPLE retail store employees regarding
3 customers' perceptions of the advantages, disadvantages, and/or differences between the APPLE
4 ACCUSED PRODUCTS and any competing products.

5
6 **REQUEST FOR PRODUCTION NO. 529:**

7 All DOCUMENTS RELATING TO any training provided to APPLE retail store
8 employees regarding the sale of, strategies to sell, or efforts to sell non-accused APPLE products
9 and/or services with APPLE ACCUSED PRODUCTS.

10

11 **REQUEST FOR PRODUCTION NO. 530:**

12 All DOCUMENTS RELATING TO any training provided to APPLE retail store
13 employees regarding consumer perceptions of the APPLE brand, including any DOCUMENT
14 reflecting efforts and/or strategies to develop loyalty to the APPLE brand.

15

16 **REQUEST FOR PRODUCTION NO. 531:**

17 All DOCUMENTS REFERRING OR RELATING TO license negotiations REGARDING
18 the SAMSUNG PATENTS-IN-SUIT.

19

20 **REQUEST FOR PRODUCTION NO. 532:**

21 All DOCUMENTS REFERRING OR RELATING TO APPLE'S understanding of the
22 ETSI IPR policy, including but not limited to the interpretation or application of Sections 4.1, 4.2,
23 or 6.1.

24

25 **REQUEST FOR PRODUCTION NO. 533:**

26 All DOCUMENTS REFERRING OR RELATING TO any company's understanding of
27 the ETSI IPR policy, including but not limited to the interpretation or application of Sections 4.1,
28 4.2, or 6.1.

1 **REQUEST FOR PRODUCTION NO. 534:**

2 All DOCUMENTS REFERRING OR RELATING TO APPLE'S disclosure of
3 DECLARED-ESSENTIAL IPR to ETSI.

4
5 **REQUEST FOR PRODUCTION NO. 535:**

6 All DOCUMENTS REFERRING OR RELATING TO APPLE'S knowledge
7 REGARDING disclosure of DECLARED-ESSENTIAL PATENTS by any company after
8 adoption of a technical standard in which they were incorporated.

9
10 **REQUEST FOR PRODUCTION NO. 536:**

11 All DOCUMENTS REFERRING OR RELATING TO UMTS Technical Specifications
12 25.212, 25.213, 25.214, and 25.322, including but not limited to all ETSI working groups working
13 on those specifications, APPLE'S attendance and participation in those working groups, all
14 COMMUNICATIONS regarding SAMSUNG technical proposals with respect to those
15 specifications, and all COMMUNICATIONS regarding any proposed alternatives to
16 SAMSUNG's technical proposals.

17
18 **REQUEST FOR PRODUCTION NO. 537:**

19 DOCUMENTS sufficient to show the date on which the APPLE ACCUSED PRODUCTS
20 first implemented any ETSI standard for which a SAMSUNG PATENTS-IN-SUIT has been
21 declared essential.

22
23 **REQUEST FOR PRODUCTION NO. 538:**

24 DOCUMENTS sufficient to show the source of all chipsets in the APPLE ACCUSED
25 PRODUCTS.

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1 **REQUEST FOR PRODUCTION NO. 539:**

2 All DOCUMENTS REFERRING OR RELATING TO APPLE'S negotiations of chipset
3 supply agreements for the APPLE ACCUSED PRODUCTS.
4

5 **REQUEST FOR PRODUCTION NO. 540:**

6 All DOCUMENTS REFERRING OR RELATING TO any instance where APPLE sought
7 an injunction for a patent which it had also licensed to any party.
8

9 **REQUEST FOR PRODUCTION NO. 541:**

10 All DOCUMENTS REFERRING OR RELATING TO any instance where APPLE sought
11 an injunction for a DECLARED-ESSENTIAL patent.
12

13 **REQUEST FOR PRODUCTION NO. 542:**

14 All DOCUMENTS REFERRING OR RELATING TO any instance where APPLE sought
15 an injunction based on any patent for which APPLE had committed to any standard-setting
16 organization, including but not limited to ETSI, that APPLE would license the patent on FRAND
17 terms.
18

19 **REQUEST FOR PRODUCTION NO. 543:**

20 All DOCUMENTS REFERRING OR RELATING TO APPLE'S understanding of ETSI
21 FRAND, including but not limited to any definition of a FRAND royalty, the effect of a FRAND
22 declaration, and the availability of injunctive relief for alleged infringement of patents subject to a
23 FRAND declaration.
24

25 **REQUEST FOR PRODUCTION NO. 544:**

26 All DOCUMENTS REFERRING OR RELATING TO any company's understanding of
27 ETSI FRAND, including but not limited to any definition of a FRAND royalty, the effect of a
28

1 FRAND declaration, and the availability of injunctive relief for alleged infringement of patents
2 subject to a FRAND declaration.

3
4 **REQUEST FOR PRODUCTION NO. 545:**

5 All DOCUMENTS REFERRING OR RELATING TO the terms of any purported license
6 to any of the SAMSUNG PATENTS-IN-SUIT.

7
8 **REQUEST FOR PRODUCTION NO. 546:**

9 All DOCUMENTS relating to the prosecution of the APPLE PATENTS-IN-SUIT or to the
10 prosecution of any patent applications in the same PATENT FAMILY TREE as the APPLE
11 PATENTS-IN-SUIT.

12
13 **REQUEST FOR PRODUCTION NO. 547:**

14 All DOCUMENTS relating to the prosecution of patent applications relating to any
15 product YOU allege embodies the APPLE PATENTS-IN-SUIT, including the APPLE ACCUSED
16 PRODUCTS.

17
18
19 DATED: February 7, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

20
21
22 By /s/ Victoria F. Maroulis

Charles K. Verhoeven

Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 7, 2012, I caused **SAMSUNG'S SIXTH SET OF**
3 **REQUESTS FOR PRODUCTION OF DOCUMENTS TO APPLE INC.** to be electronically
4 served on the following via email:

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25

26 I declare under penalty of perjury that the foregoing is true and correct. Executed in

27 Los Angeles, California on February 7, 2012.

28

/s/ Kara M. Borden