

EXHIBIT 23

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10
11 Attorneys for Plaintiff and
12 Counterclaim-Defendant APPLE INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 APPLE INC., a California corporation,

18 Plaintiff,

19 v.

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

23 Defendants.
24

Case No. 11-cv-01846-LHK (PSG)

**APPLE INC.'S OBJECTIONS AND
RESPONSES TO SAMSUNG'S SIXTH
AND SEVENTH SETS OF
REQUESTS FOR PRODUCTION**

1 **REQUEST FOR PRODUCTION NO. 375:**

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

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 375:**

7 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
8 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
9 request to the extent it seeks production of documents that: (i) are protected from discovery by the
10 attorney-client privilege or the work product doctrine, or any other applicable privilege or
11 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) would require
12 Apple to draw a legal conclusion to respond; or (iv) can be obtained as easily by Samsung, are
13 already in Samsung's possession, or are publicly available. Additionally, Apple objects to this
14 request to the extent that it calls for information which contains or otherwise reflects its trade
15 secrets or any other confidential research, development, financial, commercial or proprietary
16 information. Apple further objects to this request on the grounds that it is unlimited in time.
17 Apple further objects to the terms "relating to" and "any aspect of the design" to the extent that it
18 fails to provide reasonable particularity as to the scope of the documents sought. Finally, Apple
19 objects to this request on the grounds that it is vague, ambiguous, overly broad, including in its
20 use of the undefined terms "consumer preferences," and "purchasing decisions."

21 Subject to and without waiving the foregoing General and Specific Objections, Apple has
22 produced or will produce responsive, non-privileged market and consumer studies in its
23 possession, custody, or control, if any, located after a reasonable search.

24 **REQUEST FOR PRODUCTION NO. 376:**

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

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 376:**

2 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
3 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
4 request to the extent it seeks production of documents that: (i) are protected from discovery by the
5 attorney-client privilege or the work product doctrine, or any other applicable privilege or
6 immunity; (ii) are not relevant to the claims or defenses at issue in the case; or (iii) are outside of
7 Apple's possession, custody, or control. Additionally, Apple objects to this request to the extent
8 that it calls for information which contains or otherwise reflects its trade secrets or any other
9 confidential research, development, financial, commercial or proprietary information. Apple
10 further objects to this request on the grounds that it is unlimited in time. Apple further objects to
11 the terms "relating to" or "constraints" to the extent that it fails to provide reasonable particularity
12 as to the scope of the documents sought. Finally, Apple objects to this request on the grounds
13 that it is vague, ambiguous, overly broad, and therefore unduly burdensome.

14 Subject to and without waiving the foregoing General and Specific Objections, Apple has
15 produced or will produce responsive, non-privileged documents in its possession, custody, or
16 control, if any, located after a reasonable search sufficient to show manufacturing capacity over
17 time for each version of the iPhone and iPad.

18 **REQUEST FOR PRODUCTION NO. 377:**

19 All research, studies, reports and other DOCUMENTS REFERRING TO OR RELATING
20 TO consumer perceptions of the APPLE brand, changes in consumer perceptions of the APPLE
21 brand and the reasons for such perceptions or changes in perceptions any time from January 1,
22 2006 to the present.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 377:**

24 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
25 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
26 request to the extent it seeks production of documents that: (i) are protected from discovery by the
27 attorney-client privilege or the work product doctrine, or any other applicable privilege or
28 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of

1 limited to market segments, the size of actual and potential markets, market growth rates,
2 potential customer bases, the product offerings and pricing of competitors, actual and anticipated
3 market shares, and product sales and profitability.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 414:**

5 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
6 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
7 request to the extent it seeks production of documents that: (i) are protected from discovery by the
8 attorney-client privilege or the work product doctrine, or any other applicable privilege or
9 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
10 Apple's possession, custody, or control; or (iv) can be obtained as easily by Samsung, are already
11 in Samsung's possession, or are publicly available. Apple further objects to this request on the
12 grounds that it is unlimited in time. Apple further objects to the terms "relating to," "all
13 DOCUMENTS," and "reasons why" to the extent that they fail to provide reasonable particularity
14 as to the scope of the documents sought. Apple further objects to Samsung's request as
15 overbroad to the extent it purports to require Apple to conduct a search for documents that is
16 more extensive than is reasonable under the circumstances. Finally, Apple objects to this request
17 on the grounds that it is vague, ambiguous, overly broad, and therefore unduly burdensome.

18 Subject to and without waiving the foregoing General and Specific Objections, Apple has
19 produced or will produce responsive, non-privileged market studies in its possession, custody, or
20 control, if any, located after a reasonable search.

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

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

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 415:**

26 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
27 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
28 request to the extent it seeks production of documents that: (i) are protected from discovery by the

1 attorney-client privilege or the work product doctrine, or any other applicable privilege or
2 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
3 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
4 respond. Apple further objects to this request on the grounds that it is unlimited in time. Finally,
5 Apple objects to this request on the grounds that it is vague, ambiguous, overly broad, and
6 therefore unduly burdensome including without limitation to the undefined terms "manufacturing
7 or supply capacity."

8 Subject to and without waiving the foregoing General and Specific Objections, Apple has
9 produced responsive, non-privileged documents in its possession, custody, or control, if any,
10 located after a reasonable search sufficient to show manufacturing capacity over time for each
11 version of the iPhone and iPad.

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

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

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 416:**

17 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
18 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
19 request to the extent it seeks production of documents that: (i) are protected from discovery by the
20 attorney-client privilege or the work product doctrine, or any other applicable privilege or
21 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
22 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
23 respond. Apple further objects to this request on the grounds that it is unlimited in time. Finally,
24 Apple objects to this request on the grounds that it is vague, ambiguous, overly broad, and
25 therefore unduly burdensome including without limitation to the undefined terms "marketing and
26 sales capacity," which fails to identify with sufficient particularity the documents sought.

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

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

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 417:**

6 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
7 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
8 request to the extent it seeks production of documents that: (i) are protected from discovery by the
9 attorney-client privilege or the work product doctrine, or any other applicable privilege or
10 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
11 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
12 respond. Apple further objects to the terms "relating to" and "all DOCUMENTS" to the extent
13 that they fail to provide reasonable particularity as to the scope of the documents sought. Apple
14 further objects to this request on the grounds that it is unlimited in time. Finally, Apple objects to
15 this request on the grounds that it is vague, ambiguous, overly broad, and therefore unduly
16 burdensome including without limitation to the undefined terms "manufacturing or supply
17 capacity."

18 Subject to and without waiving the foregoing General and Specific Objections, Apple has
19 produced responsive, non-privileged documents in its possession, custody, or control, if any,
20 located after a reasonable search sufficient to show manufacturing capacity over time for each
21 version of the iPhone and iPad.

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

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

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 418:**

27 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
28 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this

1 request to the extent it seeks production of documents that: (i) are protected from discovery by the
2 attorney-client privilege or the work product doctrine, or any other applicable privilege or
3 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
4 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
5 respond. Apple further objects to this request on the grounds that it is unlimited in time. Finally,
6 Apple objects to this request on the grounds that it is vague, ambiguous, overly broad, and
7 therefore unduly burdensome including without limitation to the undefined terms "constraint" and
8 "marketing and sales capacity," which fail to identify with sufficient particularity the documents
9 sought.

10 **REQUEST FOR PRODUCTION NO. 419:**

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

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 419:**

15 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
16 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
17 request to the extent it seeks production of documents that: (i) are protected from discovery by the
18 attorney-client privilege or the work product doctrine, or any other applicable privilege or
19 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
20 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
21 respond. Apple further objects to the terms "relating to" and "all DOCUMENTS" to the extent
22 that they fail to provide reasonable particularity as to the scope of the documents sought. Apple
23 further objects to this request on the grounds that it is unlimited in time.

24 Subject to and without waiving the foregoing General and Specific Objections, Apple has
25 produced responsive, non-privileged documents in its possession, custody, or control, if any,
26 located after a reasonable search sufficient to show manufacturing capacity over time for each
27 version of the iPhone and iPad.

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

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

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 420:**

6 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
7 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
8 request to the extent it seeks production of documents that: (i) are protected from discovery by the
9 attorney-client privilege or the work product doctrine, or any other applicable privilege or
10 immunity; (ii) are not relevant to the claims or defenses at issue in the case; or (iii) are outside of
11 Apple's possession, custody, or control. Apple further objects to the terms "relating to" and "all
12 DOCUMENTS" to the extent that they fail to provide reasonable particularity as to the scope of
13 the documents sought. Apple further objects to this request on the grounds that it is unlimited in
14 time. Finally, Apple objects to this request on the grounds that it is vague, ambiguous, overly
15 broad, and therefore unduly burdensome including without limitation to the undefined terms
16 "supply or inventory excesses."

17 Subject to and without waiving the foregoing General and Specific Objections, Apple has
18 produced responsive, non-privileged documents in its possession, custody, or control, if any,
19 located after a reasonable search sufficient to show manufacturing capacity over time for each
20 version of the iPhone and iPad.

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

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

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 421:**

2 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
3 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
4 request to the extent it seeks production of documents that: (i) are protected from discovery by the
5 attorney-client privilege or the work product doctrine, or any other applicable privilege or
6 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
7 Apple's possession, custody, or control; (iv) would require Apple to draw a legal conclusion to
8 respond; or (v) can be obtained as easily by Samsung, are already in Samsung's possession, or are
9 publicly available. Apple further objects to the terms "relating to" and "all DOCUMENTS" to
10 the extent that they fail to provide reasonable particularity as to the scope of the documents
11 sought. Finally, Apple objects to this request on the grounds that it is vague, ambiguous, overly
12 broad, and therefore unduly burdensome, including without limitation because of the use of the
13 undefined terms "demand for technology," "consumer surveys," "consumer focus groups,"
14 "benefits," and "alternative technologies."

15 Subject to and without waiving the foregoing General and Specific Objections, Apple has
16 produced or will produce responsive, non-privileged market and consumer studies in its
17 possession, custody, or control, if any, located after a reasonable search.

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

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

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 422:**

22 Apple objects to this request as untimely, overly broad in scope; vague; unduly
23 burdensome; not limited to the issues, parties or products in this action; unnecessary; and not
24 reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
25 request to the extent it seeks production of documents that: (i) are protected from discovery by the
26 attorney-client privilege or the work product doctrine, or any other applicable privilege or
27 immunity; (ii) are not relevant to the claims or defenses at issue in the case; or (iii) are outside of
28 Apple's possession, custody, or control. Apple further objects to this request on the grounds that

1 it is unlimited in time. Apple further objects to Samsung's request as overbroad to the extent it
2 purports to require Apple to conduct a search for documents that is more extensive than is
3 reasonable under the circumstances.

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

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

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 423:**

11 Apple objects to this request as untimely, overly broad in scope; vague; unduly
12 burdensome; not limited to the issues, parties or products in this action; unnecessary; and not
13 reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
14 request to the extent it seeks production of documents that: (i) are protected from discovery by the
15 attorney-client privilege or the work product doctrine, or any other applicable privilege or
16 immunity; or (ii) are not relevant to the claims or defenses at issue in the case. Apple further
17 objects to this request on the grounds that it is unlimited in time. Finally, Apple further objects to
18 Samsung's request as overbroad to the extent it purports to require Apple to conduct a search for
19 documents that is more extensive than is reasonable under the circumstances.

20 **REQUEST FOR PRODUCTION NO. 424:**

21 All DOCUMENTS discussing the market for smartphones using the Android operating
22 system.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 424:**

24 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
25 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
26 request to the extent it seeks production of documents that: (i) are protected from discovery by the
27 attorney-client privilege or the work product doctrine, or any other applicable privilege or
28 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of

1 Apple's possession, custody, or control; or (iv) can be obtained as easily by Samsung, are already
2 in Samsung's possession, or are publicly available. Apple further objects to this request that it is
3 not limited to the issues in this action, the products in this action, or the relevant time period, and
4 not reasonably calculated to lead to admissible evidence. Apple objects that the term "market" is
5 vague and ambiguous. Apple also objects that this Request is duplicative of prior Requests.

6 Subject to and without waiving the foregoing General and Specific Objections, Apple has
7 produced or will produce responsive, non-privileged market and consumer studies in its
8 possession, custody, or control, if any, located after a reasonable search.

9 **REQUEST FOR PRODUCTION NO. 425:**

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

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 425:**

13 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
14 not reasonably calculated to lead to the discovery of admissible evidence. Apple further objects
15 to this request that it is not limited to the parties, issues, time period, or products in this action,
16 and not reasonably calculated to lead to admissible evidence. Apple objects to this request to the
17 extent it seeks production of documents that: (i) are protected from discovery by the attorney-
18 client privilege or the work product doctrine, or any other applicable privilege or immunity; (ii)
19 are not relevant to the claims or defenses at issue in the case; (iii) are outside of Apple's
20 possession, custody, or control; or (iv) can be obtained as easily by Samsung, are already in
21 Samsung's possession, or are publicly available. Finally, Apple objects that the term "discussing
22 competition" is vague and fails to identify with sufficient particularity the documents sought.
23 Apple also objects that this Request is duplicative of prior Requests.

24 Subject to and without waiving the foregoing General and Specific Objections, Apple has
25 produced or will produce responsive, non-privileged market and consumer studies in its
26 possession, custody, or control, if any, located after a reasonable search.

1 **REQUEST FOR PRODUCTION NO. 426:**

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

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 426:**

5 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
6 not reasonably calculated to lead to the discovery of admissible evidence. Apple further objects
7 to this request that it is not limited to the parties, issues, time period, or products in this action,
8 and not reasonably calculated to lead to admissible evidence. Apple objects to this request to the
9 extent it seeks production of documents that: (i) are protected from discovery by the attorney-
10 client privilege or the work product doctrine, or any other applicable privilege or immunity; (ii)
11 are not relevant to the claims or defenses at issue in the case; (iii) are outside of Apple's
12 possession, custody, or control; or (iv) can be obtained as easily by Samsung, are already in
13 Samsung's possession, or are publicly available. Finally, Apple objects that the term "discussing
14 competition" is vague and fails to identify with sufficient particularity the documents sought.
15 Apple also objects that this Request is duplicative of prior Requests.

16 Subject to and without waiving the foregoing General and Specific Objections, Apple has
17 produced or will produce responsive, non-privileged market and consumer studies in its
18 possession, custody, or control, if any, located after a reasonable search.

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

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

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 427:**

23 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
24 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
25 request to the extent it seeks production of documents that: (i) are protected from discovery by the
26 attorney-client privilege or the work product doctrine, or any other applicable privilege or
27 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
28 Apple's possession, custody, or control; or (iv) can be obtained as easily by Samsung, are already

1 in Samsung's possession, or are publicly available. Apple further objects to the term "relating to"
2 to the extent that it fails to provide reasonable particularity as to the scope of the documents
3 sought. Finally, Apple objects to this request on the grounds that it is vague, ambiguous, overly
4 broad, and therefore unduly burdensome including without limitation to the undefined terms
5 "elasticity" and "consumer price sensitivity".

6 Subject to and without waiving the foregoing General and Specific Objections, Apple has
7 produced responsive, non-privileged market and consumer studies, and retail, carrier and reseller
8 price lists in its possession, custody, or control located after a reasonable search as discussed in
9 more detail above.

10 **REQUEST FOR PRODUCTION NO. 428:**

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

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 428:**

14 Apple objects to this request as untimely, overly broad, vague, unduly burdensome, and
15 not reasonably calculated to lead to the discovery of admissible evidence. Apple objects to this
16 request to the extent it seeks production of documents that: (i) are protected from discovery by the
17 attorney-client privilege or the work product doctrine, or any other applicable privilege or
18 immunity; (ii) are not relevant to the claims or defenses at issue in the case; (iii) are outside of
19 Apple's possession, custody, or control; or (iv) would require Apple to draw a legal conclusion to
20 respond. Apple further objects to this request on the grounds that it is unlimited in time. Finally,
21 Apple objects to this request on the grounds that it is vague, ambiguous, overly broad, and
22 therefore unduly burdensome including without limitation to the undefined term "capacity."

23 Subject to and without waiving the foregoing General and Specific Objections, Apple has
24 produced responsive, non-privileged documents in its possession, custody, or control, if any,
25 located after a reasonable search sufficient to show manufacturing capacity over time for each
26 version of the iPhone and iPad.

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 **RESPONSE TO REQUEST FOR PRODUCTION NO. 429:**

8 Apple objects to this request on grounds that it seeks information and/or documents
9 irrelevant to this litigation. Apple further objects to the term "memory controllers technology" as
10 vague and ambiguous. Apple further objects on grounds that this request is overly broad, unduly
11 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence,
12 especially insofar as it seeks "All DOCUMENTS, regardless of date" and information regarding
13 technology not at issue in this litigation. Apple further objects to this request to the extent that it
14 seeks documents outside of Apple's possession, custody, or control. Apple further objects to this
15 request to the extent that it seeks the production of documents that are protected from discovery
16 by the attorney-client privilege, work product doctrine, joint defense or common interest
17 privilege, or any other applicable privilege, doctrine, or immunity.

18 **REQUEST FOR PRODUCTION NO. 430:**

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

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 430:**

25 Apple objects to this request on grounds that it seeks information and/or documents
26 irrelevant to this litigation. Apple further objects on grounds that this request is overly broad,
27 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
28 evidence, especially insofar as it seeks "All DOCUMENTS, regardless of date" and information

1 regarding technology not at issue in this litigation. Apple further objects to this request to the
2 extent that it seeks documents outside of Apple's possession, custody, or control. Apple further
3 objects to this request to the extent that it seeks the production of documents that are protected
4 from discovery by the attorney-client privilege, work product doctrine, joint defense or common
5 interest privilege, or any other applicable privilege, doctrine, or immunity.

6 **REQUEST FOR PRODUCTION NO. 431:**

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

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 431:**

13 Apple objects to this request on grounds that it seeks information and/or documents
14 irrelevant to this litigation. Apple further objects on grounds that this request is overly broad,
15 unduly burdensome, and not reasonably calculated to lead to the discovery of admissible
16 evidence, especially insofar as it seeks "All DOCUMENTS, regardless of date" and information
17 regarding technology not at issue in this litigation. Apple further objects to the term "3D
18 mapping technology" as vague and ambiguous. Apple further objects to this request to the extent
19 that it seeks documents outside of Apple's possession, custody, or control. Apple further objects
20 to this request to the extent that it seeks the production of documents that are protected from
21 discovery by the attorney-client privilege, work product doctrine, joint defense or common
22 interest privilege, or any other applicable privilege, doctrine, or immunity.

23 **REQUEST FOR PRODUCTION NO. 432:**

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

1 relevant time period in this action. Apple objects to this request to the extent it seeks production
2 of documents that: (i) are protected from discovery by the attorney-client privilege or the work
3 product doctrine, or any other applicable privilege or immunity; (ii) are not relevant to the claims
4 or defenses at issue in the case; (iii) are outside of Apple's possession, custody, or control; (iv)
5 would require Apple to draw a legal conclusion to respond; or (v) can be obtained as easily by
6 Samsung, are already in Samsung's possession, or are publicly available. Apple further objects to
7 the terms "relating to" and "all DOCUMENTS and things" to the extent that they fail to provide
8 reasonable particularity as to the scope of the documents sought.

9 Subject to and without waiving the foregoing General and Specific Objections, Apple
10 objects that it is incapable of responding to this request without performing an unduly
11 burdensome search.

12 Dated: March 10, 2012

MORRISON & FOERSTER LLP

14 By: /s/ Jason Bartlett
15 Jason R. Bartlett

16 Attorneys for Plaintiff
17 APPLE INC.
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CERTIFICATE OF SERVICE BY ELECTRONIC SERVICE
[Fed. R. Civ. P. 5(b)]

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 425 Market Street, San Francisco, California 94105-2482. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on March 10, 2012, I served a copy of:

APPLE INC.'S OBJECTIONS AND RESPONSES TO SAMSUNG'S SIXTH AND SEVENTH SETS OF REQUESTS FOR PRODUCTION

by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system to the e-mail address(s) set forth below, or as stated on the attached service list per agreement in accordance with Fed. R. Civ. P. 5(b).

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I declare under penalty of perjury that the foregoing is true and correct. Executed at San Francisco, California on March 10, 2012.

/s/ Nathan B. Sabri

Nathan B. Sabri