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14 Attorneys for SAMSUNG ELECTRONICS CO.,  
 LTD., SAMSUNG ELECTRONICS AMERICA,  
 15 INC. and SAMSUNG  
 TELECOMMUNICATIONS AMERICA, LLC  
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17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
 19

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

26 Defendants.  
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CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF CHRISTOPHER E.  
 PRICE IN SUPPORT OF SAMSUNG'S  
 REPLY IN SUPPORT OF MOTION TO  
 STRIKE EXPERT TESTIMONY BASED  
 ON UNDISCLOSED FACTS AND  
 THEORIES**

Date: June 21, 2012  
 Time: 10:00 a.m.  
 Place: Courtroom 5, 4th Floor  
 Judge: Hon. Paul S. Grewal



1           6.       Attached as Exhibit 9 is a true and correct copy of United States Patent Number  
2 7,663,607 B2.

3           7.       Attached as Exhibit 10 is a true and correct copy of United States Patent Number  
4 7,920,129 B2.

5           8.       Attached as Exhibit 11 is a true and correct copy of United States Patent Number  
6 7,812,828.

7           9.       Attached as Exhibit 12 is a true and correct copy of a document Apple produced  
8 in this matter, Bates numbered APLNDC00021820 - APLNDC00021821 and dated February 22,  
9 2007, that is the relevant portion of the file history for United States Patent Number 7,812,828,  
10 entitled "Information Disclosure Statement by Applicant."

11          10.       Attached as Exhibit 13 is a true and correct copy of a document Apple produced  
12 in this matter on April 4, 2012, Bates numbered APLNDC-WH0000723595 - APLNDC-  
13 WH0000723611.

14          11.       Attached as Exhibit 14 is a true and correct copy of United States Patent Number  
15 5,730,165.

16          12.       Attached as Exhibit 15 is a true and correct copy of a document Apple produced  
17 in this matter, Bates numbered APLNDC00025959 - APLNDC00025976 and dated November  
18 10, 2006, that is the relevant portion of the file history for United States Patent Number  
19 7,663,607 B2, entitled "Information Disclosure Statement."

20          13.       Attached as Exhibit 16 is a true and correct copy of United States Patent Number  
21 6,456,841 B1.

22          14.       Attached as Exhibit 17 is a true and correct copy of United States Patent Number  
23 6,208,879 B1.

24          15.       Attached as Exhibit 18 is a true and correct copy of United States Patent Number  
25 7,853,891 B2.

26          16.       Attached as Exhibit 19 is a true and correct copy of United States Patent Number  
27 6,493,002 B1.

28

1 17. Attached as Exhibit 20 is a true and correct copy of a document Apple produced  
2 in this matter, Bates numbered APLNDC-Y0000055416, which is Exhibit 15 to the deposition  
3 of Mark Buckley, taken on February 23, 2012.

4 18. Attached as Exhibit 21 is a true and correct copy of a document Apple produced  
5 in this matter, Bates numbered APLNDC-Y0000055417, which is Exhibit 16 to the deposition  
6 of Mark Buckley, taken on February 23, 2012.

7 19. Attached as Exhibit 22 is a true and correct copy of Samsung's Sixth Set of  
8 Requests for Production to Apple, Inc., dated February 7, 2012.

9 20. Attached as Exhibit 23 is a true and correct copy of the relevant portions of Apple  
10 Inc.'s Objections and Responses to Samsung's Sixth and Seventh Sets of Requests for  
11 Production, dated March 10, 2012.

12 21. Attached as Exhibit 24 is a true and correct copy of an article entitled, "Apple  
13 Made A Deal With The Devil (No, Worse: A Patent Troll)," originally accessed May 12, 2012,  
14 and printed on June 7, 2012, from the internet address, [http://techcrunch.com/2011/12/09/apple-](http://techcrunch.com/2011/12/09/apple-made-a-deal-with-the-devil-no-worse-a-patent-troll/)  
15 [made-a-deal-with-the-devil-no-worse-a-patent-troll/](http://techcrunch.com/2011/12/09/apple-made-a-deal-with-the-devil-no-worse-a-patent-troll/).

16 22. Attached as Exhibit 25 is a true and correct copy of an article entitled, "Apple  
17 partners with patent troll Digitude Innovations — and wow, what a deal," originally accessed on  
18 May 10, 2012, and printed on June 7, 2012, from the internet address,  
19 <http://venturebeat.com/2011/12/10/apples-patents-digitude-innovations/>.

20 23. Attached as Exhibit 26 is a true and correct copy of a Patent Assignment Abstract  
21 of Title for United States Patent Number 6,208,879. I obtained this document from the USPTO's  
22 website ([www.uspto.gov](http://www.uspto.gov)) on June 7, 2012.

23 24. Attached as Exhibit 27 is a true and correct copy of a Patent Assignment Abstract  
24 of Title for United States Patent Number 6,456,841. I obtained this document from the USPTO's  
25 website ([www.uspto.gov](http://www.uspto.gov)) on June 7, 2012.

26 25. Attached as Exhibit 28 is a true and correct copy of an Assignment of Assignor's  
27 Interests for Attorney Dkt #: 138347.00001, recorded on November 29, 2011. I obtained this  
28 document from the USPTO's website ([www.uspto.gov](http://www.uspto.gov)) on June 7, 2012.

1           26.     In my Declaration of Christopher E. Price in Support of Samsung's Motion to  
2 Strike (Dkt. No. 936), I attached the "Made for iPod" licenses upon which Mr. Musika relies, as  
3 Exhibits FF and GG. Apple produced these documents on March 8, 2012.

4           27.     Attached as Exhibit 29 is a true and correct copy of the relevant portions of the  
5 transcript of the April 20, 2012 deposition of Sanjay Sood.

6           28.     Attached as Exhibit 30 is a true and correct copy of the relevant portions of the  
7 transcript of the April 19, 2012 deposition of Michel Maharbiz.

8           29.     Attached as Exhibit 31 is a true and correct copy of a June 4, 2012 email sent by  
9 my colleague Ketan Patel to Apple's counsel regarding certain devices identified during the  
10 Balakrishnan deposition. Apple has not provided a written response to this email.

11           I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct.

13           Executed on June 7, 2012, at Los Angeles, California.

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Christopher E. Price