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13 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

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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,

24 LLC, a Delaware limited liability company,

25 Defendant.

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CASE NO. 11-cv-01846-LHK

**REPLY DECLARATION OF JOBY
MARTIN IN SUPPORT OF SAMSUNG'S
MOTION TO EXCLUDE OPINIONS OF
CERTAIN OF APPLE'S EXPERTS**

Date: June 21, 2012

Time: 1:30 pm

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 I, Joby Martin, declare as follows:

2 1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively, "Samsung"). I submit this declaration in
5 support of Samsung's Reply In Support of Motion To Exclude Opinions of Certain of Apple's
6 Experts. I have personal knowledge of the facts set forth in this declaration and, if called upon as
7 a witness, I could and would testify to such facts under oath.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the April
9 27, 2012 deposition transcript of John Hauser.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of the Summary of Expert
11 Opinions of Dr. Wayne S. Desarbo Concerning the July 14, 2006 Response of John R. Hauser,
12 filed as Dkt. No. 980-10 in *Schwab v. Philip Morris USA, Inc.*, Case No. 1:04-01945 (E.D.N.Y).

13 4. Attached hereto as Exhibit 3 is a true and correct copy of an article by Elie Ofek &
14 V. Srinivasan, entitled "How Much Does the Market Value an Improvement in a Product
15 Attribute?," *Marketing Science*, 2002, Vol. 21, No. 4, 398-411.

16 5. Attached hereto as Exhibit 4 is a chart demonstrating the disparities between the
17 technology claimed in the Apple patents in suit, as described by Apple's technical experts, and the
18 descriptions of these technologies in the surveys conducted by Dr. John R. Hauser.

19 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the April
20 19, 2012 deposition transcript of Henry Urbach.

21 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the April
22 20, 2012 deposition transcript of Sanjay Sood.

23 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the May 2,
24 2012 deposition transcript of Michael Walker.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed on the 7th of June, 2012, in San Francisco, California.

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 /s/ *Joby Martin*
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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Joby Martin has concurred in this filing.

/s/ Victoria Maroulis