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13 Attorneys for Samsung Electronics Co., Ltd.,
 Samsung Electronics America, Inc., and Samsung
 14 Telecommunications America, LLC

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

17 APPLE INC., a California corporation,
 18 Plaintiff,
 19 vs.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 21 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a
 New York corporation; SAMSUNG
 23 TELECOMMUNICATIONS
 AMERICA, LLC, a Delaware limited liability
 24 company,
 25 Defendants.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF ADAM CASHMAN
 IN SUPPORT OF SAMSUNG'S OPENING
 MEMORANDUM REGARDING CLAIM
 CONSTRUCTION**

Date: July 18, 2012
 Time: 2:00 pm
 Place: Courtroom 8, 4th Floor
 Judge: Hon. Lucy H. Koh

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1 I, Adam Cashman, declare:

2 1. I am an attorney 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 make this declaration in
5 connection with Samsung’s Notice of Lodging, filed herewith. I have personal knowledge of the
6 facts set forth in this declaration except where noted and, if called upon as a witness, I could and
7 would testify to such facts under oath.

8 2. Attached as Exhibit 1 is a true and correct copy of US. Design Patent D504,889 as
9 obtained from the U.S.P.T.O.

10 3. Attached as Exhibit 2 is a true and correct copy of US. Design Patent D500,037,
11 which bears bates numbers SAMNDCA00027716-722.

12 4. Attached as Exhibit 3 is a true and correct copy of excerpts from the file history of
13 US. Design Patent D504,889 bearing bates numbers APLPROS0000010188 - 0000010297.

14 5. Attached as Exhibit 4 is a true and correct copy of excerpts from the March 27,
15 2012 deposition testimony of David Bungo.

16 6. Attached as Exhibit 5 is a true and correct copy of U.S. Patent 6,919,678 as
17 obtained from the U.S.P.T.O.

18 7. I have seen a physical specimen of the Samsung Galaxy Tab 10.1, and the images
19 included in Samsung's Opening Claim Construction Brief and labeled as the “Tab 10.1” are
20 accurate images of the actual device.

21 8. Attached as Exhibit 6 is a true and correct copy of excerpts from *AppleDesign*, by
22 Paul Kunkel (1997). Page 144 of the book includes an image showing a flat panel display
23 referred to as the “Brain Box” desktop.

24 9. Attached as Exhibit 7 is a true and correct copy of a photograph depicting the 1994
25 Fidler/Knight-Ridder tablet, previously filed with the Court on August 22, 2011 as Exhibit I to the
26 Declaration of Roger Fidler.

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1 10. Attached as Exhibit 8 is a true and correct copy of printouts from a webpage
2 depicting the Compaq TC 1000 tablet computer, previously filed with the Court on August 22,
3 2011 as Exhibits M to the Declaration of Itay Sherman.

4 11. Attached as Exhibit 9 is a true and correct copy of Japanese Design Registration
5 No. 1142127, previously filed with the Court on August 22, 2011 as Exhibit J to the Declaration
6 of Itay Sherman.

7 12. Attached as Exhibit 10 is a true and correct copy of US. Design Patent D337,569
8 as obtained from the U.S.P.T.O.

9 13. Attached as Exhibit 11 is a true and correct copy of US. Design Patent D412,157
10 as obtained from the U.S.P.T.O.

11 14. Attached as Exhibit 12 is a true and correct copy of Japanese Design Registration
12 No. 0887388, previously filed with the Court on August 22, 2011 as Exhibit H to the Declaration
13 of Itay Sherman.

14 15. Attached as Exhibit 13 is a true and correct copy of U.S. Patent Application No.
15 2004/0041504 bearing bates numbers SAMNDCA00027692 – 00027708.

16 16. Attached as Exhibit 14 is a true and correct copy of excerpts from the April 16,
17 2012 expert rebuttal report of Peter W. Bressler.

18 17. Attached as Exhibit 15 is a true and correct copy of excerpts from the June 1, 2012
19 transcript of proceedings before the United States International Trade Commission in Investigation
20 No. 337-TA-796.

21 18. Attached as Exhibit 16 is a true and correct copy of a photograph taken of an
22 Apple model known as the “035,” bearing bates number APLNDC-X000005887.

23 19. Attached as Exhibit 17 is a true and correct copy of excerpts from the October 21,
24 2011 deposition of Daniele de Iuliis.

25 20. Attached as Exhibit 18 is a true and correct copy of excerpts from the November 4,
26 2011 deposition of Christopher Stringer.

27 21. Attached as Exhibit 19 is a true and correct copy of an exhibit used during the
28 November 4, 2011 deposition of Christopher Stringer, and labeled Zorkendorfer Exhibit 841.

1 22. Attached as Exhibit 20 is a true and correct copy of excerpts from the October 25,
2 2011 deposition of Quin Hoellwarth.

3 23. Attached as Exhibit 21 is a true and correct copy of excerpts from the file history
4 of US. Design Patent D618,677, which bears bates numbers APLPROS0000011597 –
5 0000011959.

6 24. Attached as Exhibit 22 is a true and correct copy of excerpts from the file history
7 of US. Design Patent D618,678, which bears bates numbers APL-ITC796-0000003690 –
8 0000003902.

9 25. Attached as Exhibit 23 is a true and correct copy of US. Design Patent D627,777
10 bearing bates numbers SAMNDCA00374013-00374019.

11 26. Attached as Exhibit 24 is a true and correct copy of US. Design Patent D637,596
12 bearing bates numbers SAMNDCA00374020-00374026.

13 27. Attached as Exhibit 25 is a true and correct copy of excerpts from U.S. Patent
14 Application No. 29/384,911 bearing bates numbers APLNDC-Y0000309846 - 0000310257.

15 28. Attached as Exhibit 26 is a true and correct copy of US. Design Patent D593,087,
16 as obtained from the U.S.P.T.O.

17 29. Attached as Exhibit 27 is a true and correct copy of excerpts from the file history
18 for US. Design Patent D593,087, which bears bates numbers APLPROS000010414-0000010773.

19 30. Attached as Exhibit 28 is a true and correct copy of US. Design Patent D618,677,
20 as obtained from the U.S.P.T.O.

21 31. Attached as Exhibit 29 is a true and correct copy of excerpts from the June 4, 2012
22 transcript of proceedings before the United States International Trade Commission in Investigation
23 No. 337-TA-796.

24 32. Attached as Exhibit 30 is a true and correct copy of Japanese Design Registration
25 No. 1241638, issued June 2005, which bears bates numbers SAMNDCA00402580 - 402598.

26 33. Attached as Exhibit 31 is a true and correct copy of Japanese Design Registration
27 No. 1204221, together with a certified translation.

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- 1 34. Attached as Exhibit 32 is a true and correct copy of an image of the LG KE850
2 Prada, which was previously filed with the Court as Exhibit U to the Declaration of Itay Sherman.
- 3 35. Attached as Exhibit 33 is a true and correct copy of an image of the Bluebird
4 Pidion, which bears bates numbers SAMNDCA00198065 – 00198067.
- 5 36. Attached as Exhibit 34 is a true and correct copy of the Korean Design Patent
6 Registration No. 30-0398307, which bears bates numbers SAMNDCA00402644 – 00402654.
- 7 37. Attached as Exhibit 35 is a true and correct copy of US. Design Patent D634,319,
8 which bears bates numbers SAMNDCA00373656 -- 00373659.
- 9 38. Attached as Exhibit 36 is a true and correct copy of US. Design Patent D602,014,
10 which bears bates number SAMNDCA00373639 – 00373645.
- 11 39. Attached as Exhibit 37 is a true and correct copy of US. Design Patent D600,241,
12 which bears bates number SAMNDCA00373631 – 00373638.
- 13 40. Attached as Exhibit 38 is a true and correct copy of US. Design Patent D629,799,
14 which bears bates numbers SAMNDCA00373721 – 00373725.
- 15 41. Attached as Exhibit 39 is a true and correct copy of US. Design Patent D602,015,
16 which bears bates numbers SAMNDCA00373584 – 00373588.
- 17 42. Attached as Exhibit 40 is a true and correct copy of US. Design Patent D642,563,
18 which bears bates numbers SAMNDCA00373794 – 00373803.
- 19 43. Attached as Exhibit 41 is a true and correct copy of US. Design Patent D627,778,
20 which bears bates numbers SAMNDCA00373704 – 00373713.
- 21 44. Attached as Exhibit 42 is a true and correct copy of U.S. Design Patent D622,720,
22 which bears bates numbers SAMNDCA00373684 – 00373695.
- 23 45. Attached as Exhibit 43 is a true and correct copy of US. Design Patent D602,486,
24 which bears bates numbers SAMNDCA00373814 – 00373820.
- 25 46. Attached as Exhibit 44 is a true and correct copy of US. Design Patent D633,493,
26 which bears bates numbers SAMNDCA00373746 – 00373754.
- 27 47. Attached as Exhibit 45 is a true and correct copy of US. Design Patent D558,758,
28 which bears bates numbers SAMNDCA00373544 – 00373547.

1 48. Attached as Exhibit 46 is a true and correct copy of US. Design Patent D581,922,
2 which bears bates numbers SAMNDCA00373552 – 00373555.

3 49. Attached as Exhibit 47 is a true and correct copy of US. Design Patent D618,677,
4 as obtained from the U.S.P.T.O.

5 50. Attached as Exhibit 48 is a true and correct copy of US. Design Patent D633,908,
6 which bears bates numbers SAMNDCA00373755 – 00373764.

7 51. Attached as Exhibit 49 is a true and correct copy of US. Design Patent D622,720,
8 which bears bates numbers SAMNDCA00373684 – 00373695.

9 52. Attached as Exhibit 50 is a true and correct copy of US. Design Patent D602,016,
10 which bears bates numbers SAMNDCA00373624 – 00373630.

11 53. Attached as Exhibit 51 is a true and correct copy of US. Design Patent D624,072,
12 which bears bates numbers SAMNDCA00373696 – 00373699.

13 54. Attached as Exhibit 52 is a true and correct copy of US. Design Patent D630,630,
14 which bears bates numbers SAMNDCA00373726 – 00373735.

15 55. Attached as Exhibit 53 is a true and correct copy of US. Design Patent D622,718,
16 which bears bates numbers SAMNDCA00373589 – 00373600.

17 56. Attached as Exhibit 54 is a true and correct copy of US. Design Patent D615,083,
18 which bears bates numbers SAMNDCA00373675 – 00373678.

19 57. Attached as Exhibit 55 is a true and correct copy of US. Design Patent D586,800,
20 which bears bates numbers SAMNDCA00373556 – 00373559.

21 58. Attached as Exhibit 56 is a true and correct copy of US. Design Patent D627,343,
22 which bears bates numbers SAMNDCA00373700 – 00373703.

23 59. Attached as Exhibit 57 is a true and correct copy of US. Design Patent D558,757,
24 as obtained from the U.S.P.T.O.

25 60. Attached as Exhibit 58 is a true and correct copy of US. Design Patent D601,588,
26 which bears bates numbers SAMNDCA00373620 – 00373623.

27 61. Attached as Exhibit 59 is a true and correct copy of US. Design Patent D618,678,
28 as obtained from the U.S.P.T.O.

1 62. Attached as Exhibit 60 is a true and correct copy of US. Design Patent D604,305
2 as obtained from the U.S.P.T.O.

3 63. Attached as Exhibit 61 is a true and correct copy of US. Design Patent D617,334
4 as obtained from the U.S.P.T.O.

5 64. Attached as Exhibit 62 is a true and correct copy of excerpts from the file history
6 of US. Design Patent D627,790, which bears bates numbers APLPROS00000012054 --
7 00000012253.

8 65. Attached as Exhibit 63 is a true and correct copy of excerpts from the March 22,
9 2012 expert report of Samuel Lucente, previously filed with the Court on May 17, 2012 as
10 Exhibits 76 to the Declaration of Brett Arnold.


11 66. Attached as Exhibit 64 is a true and correct copy of excerpts from the October 14,
12 2011 deposition of Imran Chaudhri.

13 67. Attached as Exhibit 65 is a true and correct copy of excerpts from the October 18,
14 2011 deposition of Freddy Anzures.

15 68. Attached as Exhibit 66 is a true and correct copy of excerpts from the March 22,
16 2012 Expert Report of Susan Kare.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
18 Francisco, California on June 12, 2012.

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By 
_____ Adam S. Cashman