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

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 Defendant.

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

**DECLARATION OF THOMAS WATSON  
IN SUPPORT OF SAMSUNG'S MOTION  
FOR LEAVE TO SEEK  
RECONSIDERATION OF THE COURT'S  
JUNE 25, 2012 ORDER TO THE EXTENT  
IT PRECLUDES CONSIDERATION OF A  
PRELIMINARY INJUNCTION ON THE  
'889 PATENT BASED ON CURRENT  
EVIDENCE**

Date: N/A

Time: N/A

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 I, Thomas Watson, declare:

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 have personal knowledge of the  
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such  
6 facts under oath.

7 2. Attached hereto as **Exhibit 1** is a true and accurate copy of Exhibit 30 to the Expert  
8 Report of Terry Musika.

9 3. Attached hereto as **Exhibit 2** is a true and accurate copy of Schedule 11.2 to the  
10 Expert Report of Michael J. Wagner.

11 4. Attached hereto as **Exhibit 3** is a true and accurate excerpt from the November 4,  
12 2011 deposition of Christopher Stringer.

13 5. Attached hereto as **Exhibit 4** is a true and accurate copy of exhibit 841a to the  
14 November 4, 2011 deposition of Christopher Stringer.

15 6. Attached hereto as **Exhibit 5** is a true and accurate excerpt from the October 25,  
16 2011 of Quin Hoellwarth.

17 7. Attached hereto as **Exhibit 6** is a true and accurate copy of a photograph depicting  
18 the “035 mockup” and the iPad2, from a side view, as produced by Apple at APLNDC-  
19 X00005874.

20 8. Attached hereto as **Exhibit 7** is a true and accurate copy of a photograph depicting  
21 the “035 mockup” and the iPad2, from a back view, as produced by Apple at APLNDC-  
22 X00005857.

23 9. Attached hereto as **Exhibit 8** is a true and accurate copy of a photograph depicting  
24 the “035 mockup” and the iPad2, from a front view, as produced by Apple at APLNDC-  
25 X00005858.

26 10. Attached hereto as **Exhibit 9** is a true and accurate copy of a photograph depicting  
27 the “035 mockup,” showing a corner close-up, as produced by Apple at APLNDC-X00005885.

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1           11.     Attached hereto as **Exhibit 10** is a true and accurate excerpt from the October 21,  
2 2011 deposition of Daniele De Iuliis.

3           12.     Attached hereto as **Exhibit 11** is a true and accurate excerpt from the October 31,  
4 2011 deposition of Richard Howarth

5           13.     Attached hereto as **Exhibit 12** is a true and accurate excerpts from a file history for  
6 a design patent application, bearing Bates numbers APLNDC-Y0000309166-68, 309185-91, and  
7 309316-342.

8           14.     Attached hereto as **Exhibit 13** is a true and accurate excerpts from a file history for  
9 a design patent application, bearing Bates numbers APLNDC-Y0000310117-33, and 310154-249.

10          15.     Attached hereto as **Exhibit 14** is a true and accurate excerpts from a file history for  
11 a design patent application, bearing Bates numbers APLNDC-Y0000311030-45, and 311822-91.

12          16.     Attached hereto as **Exhibit 15** is a true and accurate excerpt from the April 27,  
13 2012 deposition of Russell Winer.

14          17.     Attached hereto as **Exhibit 16** is a true and accurate copy of the Expert Report of  
15 Kent D. Van Liere, Ph.D. This report was served on Samsung by Apple on March 22, 2012.

16          18.     Attached hereto as **Exhibit 17** is a true and accurate excerpt for the D618677  
17 design patent, bearing Bates numbers APLPROS0000011930-11937. This excerpt consists of a  
18 letter entitled Reply to Office Action of October 2, 2009, and is signed by Tracy-Gene Durkin on  
19 behalf of Apple.

20          19.     Attached hereto as **Exhibit 18** is a true and accurate copy of the file history for the  
21 D618678 design patent, bearing Bates numbers APL-ITC796-0000003880-3885. This excerpt  
22 consists of a letter entitled Reply to Office Action of November 13, 2009, and is signed by Tracy-  
23 Gene Durkin on behalf of Apple. Page one of this letter does not appear in the full file history as  
24 produced by Apple.

25          20.     Attached hereto as **Exhibit 19** is a true and accurate copy of a March 28, 2012  
26 letter from Apple's counsel to Samsung's counsel.

27          21.     Attached hereto as **Exhibit 20** is a true and accurate excerpt from the April 24,  
28 2012 deposition of Peter Bressler.

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I declare under penalty of perjury that the foregoing is true and correct. Executed in  
Redwood Shores, California, on June 26, 2012.

/s/ Thomas Watson

Thomas Watson

