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

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

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

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

**DECLARATION OF SUSAN KARE  
 IN SUPPORT OF APPLE'S  
 RESPONSE TO SAMSUNG'S  
 OPENING MEMORANDUM  
 REGARDING DESIGN PATENT  
 CLAIM CONSTRUCTION**

1 I, Susan Kare, do hereby declare as follows:

2 1. My name is Susan Kare. I previously submitted my Expert Report in the current  
3 matter on March 22, 2012. I also submitted my Rebuttal Expert Report on April 16, 2012. I am  
4 currently a graphic designer at Susan Kare Design, which I founded in 1987.

5 2. My professional work has focused on the design of icons and interface graphics. I  
6 have approximately 30 years of experience in this type of design and have created icons for  
7 hundreds of clients. My qualifications are set forth in my March 22, 2012 Expert Report.

8 3. I have been asked by counsel for Apple to opine on the visual appearances of  
9 design depicted in U.S. Design Patent No. D604,305; the availability of designs that constitute  
10 alternatives to the design depicted in the D'305 patent; the relationship between functionality and  
11 visual appearances of the designs depicted in the D'305 patent.

12 4. A true and correct copy of excerpts of my March 22, 2012 Expert Report is  
13 attached hereto as Exhibit 1. A true and correct copy of excerpts of my April 16, 2012 Rebuttal  
14 Expert Report is attached hereto as Exhibit 2. My opinions are accurately set forth in these  
15 reports.

16 I declare under penalty of perjury that the foregoing, including statements from my Expert  
17 Report and Rebuttal Expert Report, is true and correct to the best of my knowledge and that this  
18 Declaration was executed on June 26, 2012, at San Francisco, CA.

19 

20 Susan Kare  
21 Susan Kare