

KANG DECLARATION EXHIBIT 2

EXHIBIT 17
PUBLIC REDACTED
VERSION

Report

Results from A Survey Measuring Use and Valuation of Four Patented Features (Patented Features: 460, 893, 711, 871) and A Survey of World Clock Patented Feature Usage (Patented Feature 055)

March 22, 2012

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1. Engagement Background

I, R. Sukumar, am the CEO of Optimal Strategix Group, Inc., which is a strategic market research and marketing consulting company. I have served as a consultant for many Fortune 500 companies, helping clients focus on understanding the value of the products they offer and the market's value for attribute improvement. I have also served as an expert witness in lawsuits, conducting survey research for cases that have involved consumer confusion and trademark infringement. My CV is attached as Exhibit D. My CV contains a list of my publications from the last 10 years. I have not provided expert testimony at trial or by deposition in the last four years.

I have been engaged by Quinn Emanuel Urquhart & Sullivan, LLP to serve as an expert to conduct survey research to understand usage and valuation of select features offered in an iPhone, iPad, or iPod Touch that they may own.

Specifically, the four features of interest are:

1. E-mail Photo:

(460 Patent) The ability to take a photo on the (iPhone, iPad, iPod Touch) and send any of the pictures stored on the (iPhone, iPad, iPod Touch) displayed in the body of an e-mail, as opposed to attaching the photo to the email which then has to be separately opened. (Ability to send the photo in the body of an email)

2. Photo Gallery Bookmark:

(893 Patent) The ability to exit the photo gallery to another app and return to the photo gallery at the same place where you left off. (Ability to return to the photo gallery at the same place that you left off any time)

3. Window Dividing:

(871 Patent) While composing a text message, Window Dividing allows you to divide the screen (for example, by pressing the bottom button twice): the first window continues to display the text message, while the second window either (a) displays app icons that perform a search function, or (b) displays icons for recently used apps. (While texting, ability to divide the screen to show text message and another function)

4. Music in Background:

(711 Patent) Allows you to listen to music while performing other tasks on your iPhone. The phone visually indicates that music is playing. (Ability to listen to music in the background, the phone indicating that music is playing)

2. Conjoint Analysis

Conjoint analysis has been used extensively in the understanding of how much the market values an improvement in a feature (Reference 3). Conjoint analysis, which is also commonly referred to as tradeoff analysis, was coined from the words “consider jointly.” It has been used in a number of legal cases to assess the importance a feature (attribute) has in a customer’s decision to buy a product. The methodology has been used in legal cases that involve patents to determine the market’s value of such improvements resulting from including a patented feature (MVAI) (Reference 3).

In conjoint analysis, a customer’s valuation of a particular feature of a product is determined by measuring the partial value (part-worth utility) of specific individual features of the product that are being tested (for example, presence or absence of feature 1, presence or absence of feature 2, etc.).

Conjoint analysis is administered using a type of software developed by Sawtooth Software referred to as CBC (Choice Based Conjoint) (Reference 4,5). We conducted an online survey of a group of respondents who constitute a representative sample of the target population of users of the devices. During this survey, respondents are shown three product combinations with features that represent an improvement, each combination having its own price. Each question shows the respondent three such combinations with associated prices and the respondent is required to make a choice among the three options (See Exhibit G). The respondent sees 12 such choice sets. This method has been used for decades and commercial applications are referenced in [References 1, 2].

3. Survey Inputs

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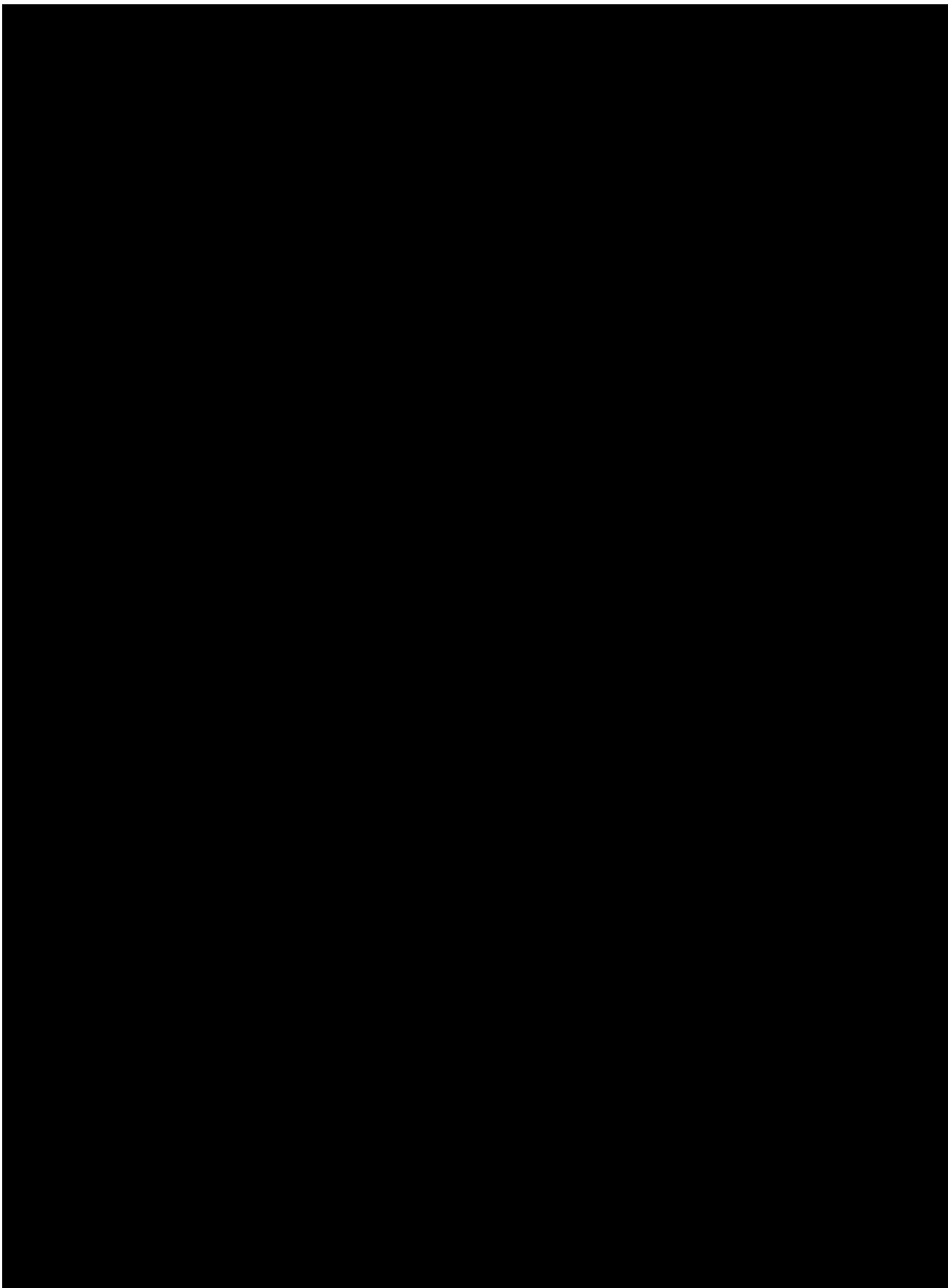
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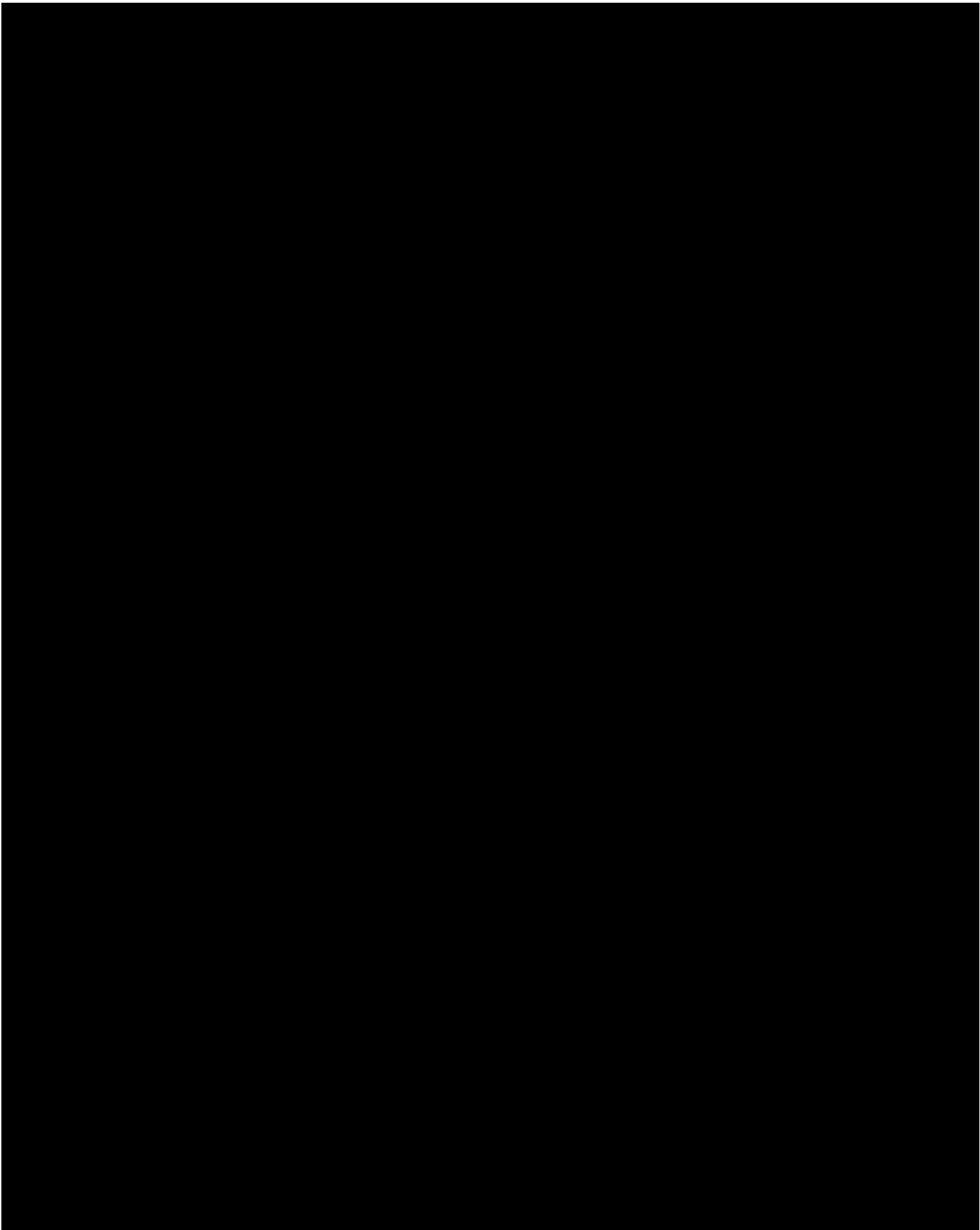
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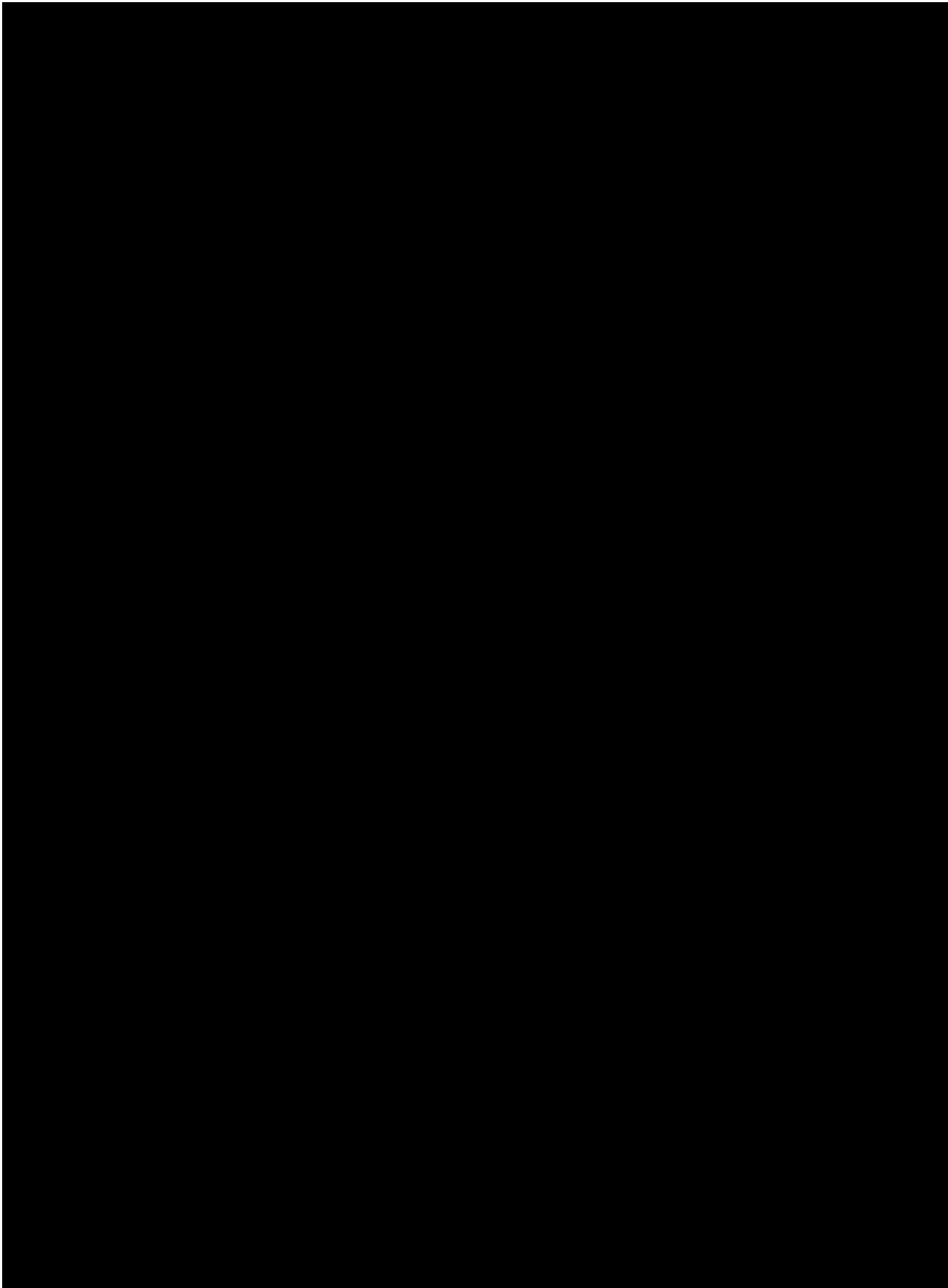
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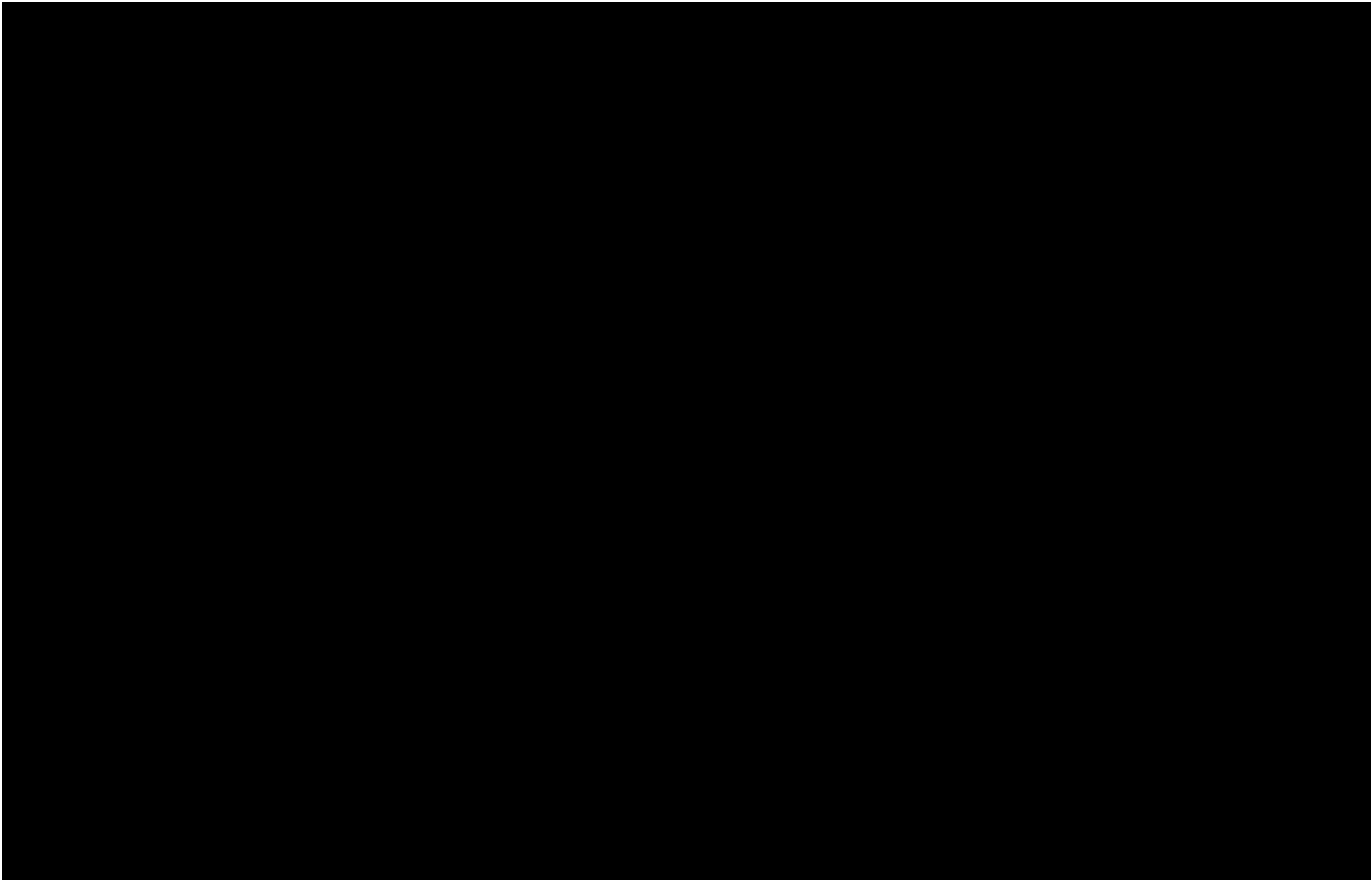
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R. Sukumar, Ph.D.

March 22, 2012