

KANG DECLARATION EXHIBIT 4

Exhibit 3
(Submitted Under Seal)

SUBJECT TO PROTECTIVE ORDER
CONTAINS HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY INFORMATION

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CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, 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,
LLC, a Delaware limited liability company,
24 Defendants.
25

CASE NO. 11-cv-01846-LHK

**SAMSUNG’S SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
APPLE’S SIXTEENTH SET OF
INTERROGATORIES (NO. 81)**

**HIGHLY CONFIDENTIAL –
ATTORNEYS’ EYES ONLY**
UNDER THE PROTECTIVE ORDER

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1 already in the possession of Apple, publicly available, or as readily available to Apple as it is to
2 Samsung.

3 24. Samsung objects to each interrogatory to the extent that it seeks information before
4 Samsung is required to disclose such information in accordance with any applicable law, such as
5 the Northern District of California Patent Local Rules.

6 25. Samsung objects to the interrogatories on the grounds and to the extent that they
7 seek legal conclusions or call for expert testimony. Samsung’s responses should not be
8 construed to provide legal conclusions.

9 Subject to and without waiving the foregoing General Statement and General Objections,
10 Samsung responds as follows:

INTERROGATORIES

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14 **INTERROGATORY NO. 81:**

15 Explain in detail the operation of any monitoring circuitry, integrated circuit, chip,
16 controller, or module used to operate the touch screens (including the display and touch sensor
17 panels) and used to respond to touch events for each Product at Issue, with reference to and
18 identification of specific source code and microcode files and functions.

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20 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 81:**

21 In addition to the General Objections stated above, Samsung objects to this interrogatory
22 as vague and ambiguous. Samsung further objects to this interrogatory to the extent that it seeks
23 to elicit information subject to and protected by the attorney-client privilege, the attorney work-
24 product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
25 applicable privilege or immunity. Samsung further objects to this interrogatory on the grounds
26 and to the extent that it seeks legal conclusions or calls for expert testimony. Samsung will
27 provide such contentions in accordance with the Court’s Minute Order and Case Management
28 order, dated August 25, 2011.

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1 Subject to the foregoing general and specific objections, and following a reasonable
2 investigation, Samsung responds as follows:

Product at Issue			
Acclaim			
Captivate			
Continuum			
Droid Charge			
Exhibit 4G			
Epic 4G			
Fascinate			
Gem			
Galaxy Ace			
Galaxy Prevail			
Galaxy S (i9000)			
Galaxy S 4G			
Galaxy S II			
Gravity			
Indulge			
Infuse 4G			
Intercept			
Mesmerize			
Nexus S			
Nexus S 4G			
Replenish			
Showcase Galaxy S			
Sidekick			
Transform			
Vibrant			
Galaxy Tab 10.1			

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1 Samsung further responds that some of the information requested in this interrogatory is
2 outside Samsung’s possession, custody or control. Pursuant to Rule 33(d), Samsung further
3 responds by citing the following documents from which such information may be determined:
4 ATMEL-SAMSUNG00000001-8302; SAMNDCA00298514-SAMNDCA00298644;
5 SAMNDCA00298645-SAMNDCA00298748; SAMNDCA00298749-SAMNDCA00298801;
6 SAMNDCA00298802-SAMNDCA00299039; SAMNDCA00299040-SAMNDCA00299312;
7 SAMNDCA00299313-SAMNDCA00299344; SAMNDCA00299345-SAMNDCA00299425;
8 SAMNDCA00324077-SAMNDCA00324077; SAMNDCA00324078-SAMNDCA00324082;
9 SAMNDCA00324083-SAMNDCA00324087; SAMNDCA00324088-SAMNDCA00324093;
10 SAMNDCA10280557-SAMNDCA10283952; SAMNDCA10765141-SAMNDCA10765619;
11 SAMNDCA10885838-SAMNDCA10924995. Samsung further refers to the transcripts for the
12 depositions of Heon-Seok Lee, Martin Simmons and Samuel Brunet from which the requested
13 information can be determined.

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DATED: March 16, 2012

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