

# **KANG DECLARATION EXHIBIT 5**

Exhibit 4  
(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  
15

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

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

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

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. 1:**

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.

19  
20 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

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.

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

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

Product at Issue	Touchscreen IC Vendor	Touchscreen IC P/N	Touchscreen IC F/W Version	TSP Module Vendor
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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**SUBJECT TO PROTECTIVE ORDER**  
**CONTAINS HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY INFORMATION**

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.

14

15 **SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 1:**

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

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

26

Product at Issue	Touchscreen IC Vendor	Touchscreen IC P/N	Touchscreen IC F/W Version	TSP Module Vendor
Acclaim				

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**SUBJECT TO PROTECTIVE ORDER**  
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1	Captivate	
2	Continuum	
3	Droid Charge	
4	Exhibit 4G	
4	Epic 4G	
5	Fascinate	
6	Gem	
7	Galaxy Ace	
8	Galaxy Prevail	
9	Galaxy S (i9000)	
9	Galaxy S 4G	
10	Galaxy S II	
11	Galaxy S 2 Epic 4G Touch	
12	Galaxy S 2 Skyrocket	
13	Gravity	
14	Indulge	
15	Infuse 4G	
16	Intercept	
16	Mesmerize	
17	Nexus S	
18	Nexus S 4G	
19	Replenish	
20	Showcase Galaxy S	
21	Showcase i500	
21	Sidekick	
22	Transform	
23	Vibrant	
24	Galaxy Tab	
25	Galaxy Tab 10.1	

26 Samsung further responds that some of the information requested in this interrogatory is  
27 outside Samsung’s possession, custody or control. Pursuant to Rule 33(d), Samsung further  
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8 SAMNDCA10280557-SAMNDCA10283952; SAMNDCA10765141-SAMNDCA10765619;  
9 SAMNDCA10885838-SAMNDCA10924995. Samsung further refers to the transcripts for the  
10 depositions of Heon-Seok Lee, Martin Simmons and Samuel Brunet from which the requested  
11 information can be determined.

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DATED: March 22, 2012

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