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13 Attorneys for Samsung Electronics Co., Ltd.,  
 Samsung Electronics America, Inc., and Samsung  
 14 Telecommunications America, LLC

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

17 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK

18 Plaintiff,

**DECLARATION OF PATRICK  
 SCHMIDT IN SUPPORT OF SAMSUNG'S  
 CLAIM CONSTRUCTION BRIEF**

19 vs.

20 SAMSUNG ELECTRONICS CO., LTD., a  
 21 Korean business entity; SAMSUNG  
 ELECTRONICS AMERICA, INC., a  
 22 New York corporation; SAMSUNG  
 TELECOMMUNICATIONS  
 23 AMERICA, LLC, a Delaware limited liability  
 company,

24 Defendants.  
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1 I, Patrick Schmidt, declare:

2 1. I am an attorney with 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 make this declaration in support  
5 of Samsung’s Claim Construction Brief. I have personal knowledge of the facts set forth in this  
6 declaration except where noted and, if called upon as a witness, I could and would testify to such  
7 facts under oath.

8 2. Attached as Exhibit 1 is a true and correct copy of U.S. Patent No. 7,469,381  
9 (the ’381 patent).

10 3. Attached as Exhibit 2 is a true and correct copy of excerpts from the August 16,  
11 2011 deposition transcript of Ravin Balakrishnan.

12 4. Attached as Exhibit 3 is a true and correct copy of Exhibit 104 from the August 16,  
13 2011 deposition transcript of Ravin Balakrishnan.

14 5. Attached as Exhibit 4 is a true and correct copy of excerpts from the August 9,  
15 2011 deposition transcript of Bas Ording.

16 6. Attached as Exhibit 5 is a true and correct copy of excerpts from the May 17, 2012  
17 declaration of Andries van Dam in Support of Samsung’s Motion for Summary Judgment  
18 Regarding the Invalidity of U.S. Patent No. 7,469,381.

19 7. Attached as Exhibit 6 is a true and correct copy of an excerpt from the “Exemplary  
20 Infringement Claim Chart for U.S. Patent No. 7,469,381” filed by Apple in the ITC proceeding  
21 *Certain Portable Electronic Devices and Related Software*, 337-TA-797.

22 8. Attached as Exhibit 7 is a true and correct copy of U.S. Patent No. 7,864,163  
23 (the ’163 patent).

24 9. Attached as Exhibit 8 is a true and correct copy of excerpts from the March 22,  
25 2012 Expert Report of Stephen Gray Regarding Invalidity of U.S. Patent Nos. 7,844,915 and  
26 7,864,163.

27 10. Attached as Exhibit 9 is a true and correct copy of excerpts from the April 26, 2012  
28 deposition transcript of Karan Singh (volume 1).

1 11. Attached as Exhibit 10 is a true and correct copy of excerpts from the October 27,  
2 2011 deposition transcript of Scott Forstall.

3 12. Attached as Exhibit 11 is a true and correct copy of excerpts from the October 26,  
4 2011 deposition transcript of Andre Boule.

5 13. Attached as Exhibit 12 is a true and correct copy of excerpts from the October 28,  
6 2011 deposition transcript of Richard Williamson.

7 14. Attached as Exhibit 13 is a true and correct copy of excerpts from the May 31,  
8 2012 Declaration of Karan Singh in Support of Apple's Opposition to Samsung's Motion for  
9 Summary Judgment.

10 15. Attached as Exhibit 14 is a true and correct copy of excerpts from the April 16,  
11 2012 Rebuttal Expert Report of Dr. Karan Singh Regarding Validity of U.S. Patent Nos.  
12 7,864,163, 7,844,915 and 7,853,891.

13  
14 I declare under penalty of perjury that the foregoing is true and correct. Executed in Los  
15 Angeles, California on July 5, 2012.

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18 By           /s/ Patrick T. Schmidt            
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