

Exhibit 6

**UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.**

**Before The Honorable Thomas B. Pender
Administrative Law Judge**

In the Matter of

**CERTAIN ELECTRONIC DIGITAL
MEDIA DEVICES AND COMPONENTS
THEREOF**

Investigation No. 337-TA-796

SAMSUNG'S PRE-HEARING BRIEF

**CONTAINS CONFIDENTIAL BUSINESS INFORMATION SUBJECT TO
PROTECTIVE ORDER**

I. INTRODUCTION

Apple's patent claims here are just one piece of a worldwide litigation war started by Apple last year. That assault results from Apple's fear of legitimate competition from Android alternatives, which give consumers an attractive competitive option. Apple's desire to stop Android competition at any cost, stems from Steve Jobs himself, who reportedly said: "I'm going to destroy Android, because it's a stolen product. I'm willing to go thermonuclear war on this." "I will spend my last dying breath if I need to, and I will spend every penny of Apple's \$40 billion in the bank, to right this wrong."

Samsung is a leading innovator of new technologies and improvements to existing technologies. Apple, by contrast, is not a significant innovator, but is by any standard an extraordinarily successful marketer.

Samsung's commitment to innovation is nowhere more evident than in the smartphone industry. Samsung began developing mobile phone technology in 1991, more than 15 years before Apple announced its first phone. Samsung has since invested billions of dollars researching and developing patented technologies, paving the way for today's smartphones.

In 2007, long after Samsung introduced its first mobile phone, Apple entered the mobile device market with the iPhone. Apple did not become a leader in cellular communications overnight, nor did it build its smartphone platform from scratch. Rather, Apple successfully repackaged and marketed technology developed by Samsung and others.

As Steve Jobs noted: "Picasso had a saying, 'Good artists copy, great artists steal.' And we [Apple] have always been shameless about stealing great ideas." Apple was, by its own CEO's admission, the consummate copier and thief. Yet Apple changed its tune after the success of the iPhone, warning, in 2009, that "we like competition as long as they don't rip off our IP.

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Dated: May 10, 2012

Respectfully submitted,

/s/ S. Alex Lasher

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