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14 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

15 INC. and SAMSUNG

16 TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

24 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

25 TELECOMMUNICATIONS AMERICA,

26 LLC, a Delaware limited liability company,

27 Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S PROPOSED *VOIR DIRE*
QUESTIONS**

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 **SAMSUNG'S PROPOSED VOIR DIRE QUESTIONS**

2 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
3 Telecommunications America, LLC (collectively, "Samsung") hereby submit the following *voir*
4 *dire* questions in addition to the questions included in the parties' joint proposed Juror
5 Questionnaire.

6 1. Have you, a family member, or a close friend of yours ever worked for a company
7 other than Apple or Samsung that develops, manufactures, markets or services mobile phones or
8 tablet computers?

9 2. Have you ever owned an iPhone, iPad or Mac computer? If yes, which one(s)?

10 3. Are you thinking about buying an iPhone, iPad and/or Mac computer in the future?

11 4. Do you have any negative impressions or opinions about South Korean companies
12 or business people?

13 5. Do you think many Asian companies steal what others have created and sell
14 products based on copied innovation?

15 6. Have you been negatively impacted by the recent economic downturn?

16 7. Do you think most companies with monopoly power would end up abusing their
17 monopoly power in the marketplace?

18 8. Have you ever applied for a patent, copyright or trademark with the US Patent &
19 Trademark Office? If so, please explain what it was for, whether or not it was granted, and when
20 it was.

21 9. Have you heard or read anything about the legal dispute between Apple and
22 Samsung? If yes, what have you heard about the dispute? What is the source of the information
23 you've heard or read about the dispute? Have you formed any impression of the dispute?

24 10. You have been given lists of lawyers and witnesses.

25 a. Are any of you related to, or personally acquainted with, any of the
26 lawyers?

27 b. With any of the witnesses?

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1 11. If you are selected to be a member of the jury, you must follow the law that I will
2 tell you to apply, disregarding your own ideas about what the law is or should be. Will you do
3 this?

4 12. Jurors have to listen to the testimony of the various witnesses and decide how much
5 or how little weight to give the testimony. Are you will and able to do that?

6 13. Do you know of anything I haven't touched on that might affect your qualifications
7 or ability to serve as a juror in this case or prevent you from rendering an impartial verdict based
8 solely on the evidence and on my instructions to you about the law?

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10 DATED: July 11, 2011

Respectfully submitted,

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QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By */s/ Victoria Maroulis*

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