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13 Attorneys for SAMSUNG ELECTRONICS CO.,  
 LTD., SAMSUNG ELECTRONICS AMERICA,  
 14 INC. and SAMSUNG  
 TELECOMMUNICATIONS AMERICA, LLC  
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16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
 18

19 APPLE INC., a California corporation,  
 20 Plaintiff,  
 21 vs.  
 22 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 23 ELECTRONICS AMERICA, INC., a New  
 York corporation; SAMSUNG  
 24 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,  
 25 Defendant.  
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CASE NO. 11-cv-01846-LHK  
**DECLARATION OF THOMAS WATSON  
 IN SUPPORT OF SAMSUNG'S  
 PROPOSED JURY INSTRUCTIONS**

**Place: Courtroom 8, 4th Floor  
 Judge: Hon. Lucy H. Koh**

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I, Thomas Watson, declare:

1. I am an associate with the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”). I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify to such facts under oath.

2. Attached hereto as **Exhibit A** is a true and correct copy of Apple Inc.’s (“Apple’s”) Initial Disclosures Pursuant to Rule 26(A)(1), dated August 26, 2011.

3. Attached hereto as **Exhibit B** is a true and correct copy of Apple’s First Amended and Supplemental Initial Disclosures Pursuant to Rule 26(A)(1), dated March 4, 2012.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from Apple’s Objections and Responses to Samsung’s First Set of Interrogatories, dated September 12, 2011.

5. Attached hereto as **Exhibit D** is a true and correct copy of the cover pleading from Apple’s Disclosure of Asserted Claims & Infringement Contentions, dated August 26, 2011.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood Shores, California on July 13, 2012.

/s/ Thomas Watson

Thomas Watson

