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Attorneys for Plaintiff and  
 Counterclaim-Defendant Apple Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

APPLE INC., a California corporation,  
 Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity, SAMSUNG  
 ELECTRONICS AMERICA, INC., a New  
 York corporation, and SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,  
 Defendants.

SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity, SAMSUNG  
 ELECTRONICS AMERICA, INC., a New  
 York corporation, and SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,  
 Counterclaim-Plaintiffs,

v.

APPLE INC., a California corporation,  
 Counterclaim-Defendant.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S IDENTIFICATION  
 OF DEPOSITION DESIGNATIONS  
 AND OTHER DISCOVERY TO BE  
 OFFERED AT TRIAL**

1 Pursuant to the Court's Minute Order and Case Management Order, dated July 9, 2012,  
2 Apple hereby identifies the excerpts of deposition testimony and other discovery that it intends to  
3 offer at trial other than solely for purposes of impeachment or rebuttal. Apple does not waive its  
4 right to object (i) to the witness or to the use of testimony from a witness if the witness is called  
5 by Samsung, or (ii) to the use of the discovery response or disclosure if offered by Samsung.  
6 Apple reserves the right to amend or supplement its designations of deposition testimony or other  
7 discovery, including in response to any evidence offered by Samsung at trial and/or on the basis  
8 of any information or documents obtained from discovery which has not yet been completed.  
9 Apple also reserves the right to designate testimony from any witness on Samsung's list of  
10 deposition designations and to offer any other discovery identified by Samsung.

11 **I. DEPOSITION DESIGNATIONS**

12 The excerpts of deposition testimony that Apple intends to offer at trial, other than solely  
13 for purposes of impeachment or rebuttal, are identified in the attached Exhibit A. Pursuant to the  
14 parties' agreement, Apple shall serve on Samsung copies of these deposition transcripts that have  
15 been highlighted to identify the designated testimony. Objections and instructions have been  
16 included for ease of reading, but are not designated.

17 **II. OTHER DISCOVERY**

18 Apple intends to offer the following discovery at trial, including the documents  
19 incorporated by reference therein, other than discovery offered solely for purposes of  
20 impeachment or rebuttal:

- 21 1. Samsung's Disclosure of Asserted Claims and Infringement Contentions (Patent  
22 L.R. 3-1, 3-2), and incorporated exhibits.
- 23 2. Samsung's Objection and Response to Apple's First Set of Interrogatories  
24 Relating to Apple's Motion for a Preliminary Injunction, Response to  
Interrogatory No. 1, dated September 26, 2011.
- 25 3. Samsung's Second Supplemental Objections and Response to Apple's Second Set  
26 of Interrogatories, Response to Interrogatory No. 2, dated March 12, 2012, and  
documents incorporated by reference therein.

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4. Samsung's Supplemental Objections and Response to Apple's Second Set of Interrogatories Relating to Apple's Motion for a Preliminary Injunction, Response to Interrogatories Nos. 12-13, dated October 12, 2011, and documents incorporated by reference therein.
5. Samsung's Second Supplemental Objections and Response to Apple's Second Set of Interrogatories Relating to Apple's Motion for a Preliminary Injunction, Response to Interrogatory No. 10, dated November 21, 2011, and documents incorporated by reference therein.
6. Samsung's Third Supplemental Objections and Response to Apple's Second Set of Interrogatories Relating to Apple's Motion for a Preliminary Injunction, Response to Interrogatory No. 11, dated March 8, 2012, and documents incorporated by reference therein.
7. Samsung's Second Supplemental Objections and Responses to Apple's Third Set of Interrogatories, Response to Interrogatories Nos. 8-9, dated January 14, 2012.
8. Samsung's Objections and Response to Apple's Fourth Set of Interrogatories, Response to Interrogatory No. 10, dated November 14, 2012, and Exhibit A thereto.
9. Samsung's Amended Objections and Response to Apple's Sixth Set of Interrogatories, Response to Interrogatory No. 14, dated March 7, 2012.
10. Samsung's Supplemental Objections and Response to Apple's Eighth Set of Interrogatories, Response to Interrogatory No. 17, dated March 16, 2012.
11. Samsung's Objections and Response to Apple's Tenth Set of Interrogatories, Response to Interrogatory No. 36, dated February 29, 2012.
12. Samsung's Supplemental Objections and Response to Apple's Tenth Set of Interrogatories, Response to Interrogatories Nos. 27-33, dated March 19, 2012.
13. Samsung's Objections and Responses to Apple's 15th Set of Interrogatories, Response to Interrogatory No. 77, dated March 8, 2012.
14. Samsung's Objections and Responses to Apple's Third Set of Requests for Admission, Responses to Requests 22-23, dated February 29, 2012.
15. Samsung's Amended Objections and Responses to Apple's Fourth Set of Requests for Admission, Responses to Requests Nos. 84-275, dated March 6, 2012.
16. Samsung's Objections and Responses to Apple's Seventh Set of Requests for Admission, Responses to Request Nos. 301-304, 309 and 362, dated March 7, 2012.

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- 17. Samsung's Objections and Responses To Apple Inc.'s Eighth Set of Requests for Admission, Responses to Request Nos. 381-387, dated March 10, 2012.
  
- 18. Samsung's Objections and Responses to Apple's Ninth Set of Requests for Admission, Responses to Request Nos. 446, 449, 451, 453, 455, 457, 536-543, 549, 551, 552, 553-562, 568-570, 572, 573, 578-589, 595-596, 602, 604-608, 610-616, 621-622, 625, 627-639, 642-643, 648-649, 652-667, 670, 681-683, 691-704, 706, 714, 716-721, 722 and 726, dated March 10, 2012.
  
- 19. Samsung's Objections and Responses to Apple's Tenth Set of Requests for Admission, Responses to Request Nos. 1191-1192, 1198-1199, 1205-1206, 1212-1213, 1219-1220, 1226-1227, 1233-1234, 1240-1241, 1247-1248, 1261-1262, 1275-1276, 1282-1283, 1289-1290, 1296-1297, 1303-1304, 1210-1211, 1317-1318, 1324-1325, 1331-1332, 1338-1339, 1345-1346, 1352-1353, 1359-1360, 1366-1367, dated March 10, 2012.

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Dated: July 16, 2012

MORRISON & FOERSTER LLP

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