EXHIBIT A (Filed Under Seal)

Exhibit A - Samsung's General Objections to Apple's Exhibit List

| 1 | Exhibit A - Samsung's General Objections to Apple's Exhibit List |
|----------|--|
| 2 | Samsung generally objects to Apple's Exhibit List for all the reasons discussed in |
| 3 | Samsung's motions <i>in limine</i> , filed on July 5, 2012. Samsung further objects to the extent Apple's |
| 4 | exhibits are translations that are inaccurate and/or misleading. Samsung will serve its specific |
| 5 | objections to Apple's proposed translations according to the schedule agreed to by the parties. |
| 6 | Finally, Samsung reserves the right to raise additional objections during the proceedings, |
| 7 | depending on the manner in which an exhibit is offered into evidence. |
| 8 | Samsung's Objection To Apple's Effort To Circumvent The 125-Exhibit Limit By Designating Multiple Documents As Single Exhibits |
| 9 | Apple has blatantly violated the Court's July 9, 2012 Minute Order and Case Management |
| 10 | Order which provides that the parties may each identify only 125 exhibits, not counting rebuttal |
| 11 | and impeachment exhibits. Apple makes a complete end-run around the Court's restriction on the |
| 12 | number of exhibits by artificially combining a large numbers of separate exhibits under a single |
| 13 | exhibit number. Left unchecked, Apple's gamesmanship will severely penalize Samsung for |
| 14 | playing by the rules and listing 125 proper exhibits. And Samsung is not complaining about a |
| 15 | small number of additional exhibits: Apple crams roughly 498 exhibits into multi-document |
| 16 | "Exhibits" 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 17, 18, 19, 20, 21, 22, 25, 26, 27, 28, 29, and |
| 17 | 123. This prejudicial violation of the Court's effort to streamline this trial should not be |
| 18 | permitted. |
| 19 20 | For example, Apple's Exhibit 1 is a 99-page exhibit broken into seven subparts with the |
| 20 | following titles: (i) Sketches of Pre-iPhone Designs Considered by Apple, (ii) CAD Images of |
| 21 | Pre-iPhone Designs Considered by Apple, (iii) Photographs of Models of Pre-iPhone Designs |
| 22 | Considered by Apple, (iv) Photographs of Other Models of Designs Considered by Apple, |
| 23 | (v) Sketches of Pre-iPad Designs Considered by Apple, (vi) CAD Images of Pre-iPad Designs |
| 24 | Considered by Apple, and (vii) Photographs of Models of Tablet Designs Considered by Apple. |
| 25 26 | This "exhibit" consists of over 249 images that Apple cobbled together from roughly 34 different |
| 26 | sources: some of the documents incorporated into this exhibit were produced in this or related |
| 27 | actions: some have no identification or attribution at all: and some are themselves freestanding |

actions; some have no identification or attribution at all; and some are themselves freestanding

declaration exhibits, expert report exhibits, and trial exhibits from the recent ITC hearing. No
 matter how you look at it, this collection of documents cannot be considered one exhibit.

3 As another example, Exhibit 26, which Apple claims will be sponsored by its expert, Mr. 4 Musika, consists of an elaborate chart containing selective and biased quotations from--or 5 comments about--a total of 123 separate and unrelated documents. The total number of documents quoted in this one exhibit almost exceeds the number of permitted exhibits. And 6 7 Exhibit 27 consists of a chart titled "Summary of Select Document Reflecting Comments on the Smartphone and Tablet Marketplace." The chart consists of 40 separate line items and each line 8 9 item contains direct quotations from random third party and Samsung documents that bear no 10 relation to each other. Many of the documents being quoted from were marked as separate exhibits during depositions taken in this matter. As these examples show, Apple's efforts to 11 12 shoehorn the content of a multitude of documents into a single exhibit is a clear violation of the 13 Court's order.

In the same vein, Apple's Exhibit 5 contains select quotations from nine press reports
followed by the reports themselves. Exhibit 6 contains quotations from 18 press reports followed
by the reports themselves, and Exhibit 17 contains quotations from 28 different news articles and
the articles themselves. Each of the reports and articles within these exhibits is a separate, freestanding document and should count as *one* exhibit.

Apple has also engaged in egregious conduct with video compilations. Exhibit 12 consists
of 68 different video files, each containing a separate iPhone advertisement. Likewise, Exhibit 14
is comprised of 27 media clips regarding the iPad and iPhone. Once again, each video file is a
separate exhibit.

Apple has done the same thing with improper compilations of pictures and documents related to alleged design alternatives. Exhibit 10, with a title of "Alternative Designs" on the first page, is a 141-page exhibit consisting of numerous images of 13 different products. Exhibit 20 is a 178-page exhibit with headings such as "Smartphone Alternative Designs," "Tablet Alternative Designs" and "GUI Alternative Designs." It includes images and documents relating to 33 additional products. These alleged alternative designs are analogous to the prior art references that -2- Case No. Case No. 11-cv-01846-LHK Samsung included on its exhibit list individually with separate exhibit numbers because they are
 separate products or other references. If Apple were playing by the rules like Samsung did, then
 each alleged alternative product would be a separate exhibit.

None of these exhibits is permissible as a Federal Rule of Evidence 1006 summary. 4 5 Indeed, Apple appears to concede this point for all but one of its multi-document "compilations" because Apple identified only Exhibit 123 as an "FRE 1006 summary" in its exhibit list. Federal 6 7 Rule of Evidence 1006 provides that a party may "use a summary, chart, or calculation to prove 8 the content of voluminous writings, recordings, or photographs that cannot be conveniently 9 examined in court." Fed. R. Evid. 1006. Federal Rule of Evidence 1006 does not apply to 10 documents that are straightforward and are not voluminous. Highland Capital Mgmt., L.P. v. Schneider, 551 F. Supp. 2d 173, 190 (S.D.N.Y. 2008) (FRE 1006 summaries may only be used 11 when the underlying evidence is so voluminous that it cannot conveniently be examined by a jury 12 13 and cannot be used where the underlying evidence is "relatively straightforward"). It is typically 14 used to summarize "concrete, mathematical, objective information [that] is capable of accurate presentation in chart or summary form." U.S. v. Stone, 2012 WL 441168, at *5 (E.D. Mich. Feb. 15 16 10, 2012); see also United States v. Johnson, 594 F.2d 1253, 1255 (9th Cir. 1979) ("The purpose 17 of Rule 1006 is to allow the use of summaries when the volume of documents being summarized 18 is so large as to make their use impractical or impossible.") To be sure, Exhibit 123 is no 19 exception to Apple's improper exhibit designations. The five freestanding documents contained in 20 Exhibit 123 are not voluminous, are straightforward, and can be "conveniently examined in court." 21 Accordingly, the Court should strike exhibits 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 17, 18, 19, 20, 21, 22, 25, 26, 27, 28, 29, and 123 because Apple has violated the Court's order limiting the 22 23 number of exhibits for each side to 125. If the Court decides to permit any portion of these 24 exhibits, Samsung should not be disadvantaged because it played by the rules. Instead, Samsung 25 should be granted the right to include 498 additional exhibits on its exhibit list. 26 27 28

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|----------|----------|-------------------------|---|--------|----------|--|
| 1 | N/A | N/A | Phone and Tablet Designs Considered by Apple | N/A | N/A | Christopher Stringer | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 602, I, D, U, 403, lacks sponsoring witness, MIL 1, MIL 3 |
| 2 | N/A | N/A | Phone and Tablet Invention CAD Images | N/A | N/A | Christopher Stringer | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 602, I, D, U, 403, lacks sponsoring witness, MIL 1, MIL 3 |
| 3 | N/A | N/A | Timeline of Samsung Smartphones | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, misleading, incomplete, 402, 802, 602, I, D, U, 403, lacks sponsoring witness, MIL 3, MIL 7 |
| 4 | N/A | N/A | Timeline of Samsung Tablets | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, lacks sponsoring witness, misleading, incomplete, 402, 802, 602, I, D, U, 403, MIL 3, MIL 7 |
| 5 | N/A | N/A | Summary of Press Reports Regarding Samsung Tablet Designs | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, lacks sponsoring witness, misleading, incomplete, 402, 403, 802, 602, I, MIL 2, D, U, MIL 1 |
| 6 | N/A | N/A | Summary of Press Reports Regarding Samsung Phone Designs | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, misleading, incomplete, 402, 802, 602, I, MIL 2, 403, D, U, lacks sponsoring witness, MIL 1 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|--|---------------------|---------------------|-----------------------|---|--------|----------|---|
| 7 | N/A | N/A | Photographs of accused Samsung devices | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 802, 602, I, U, D, MIL 7, 402, 403, 1002, lacks sponsoring witness, misleading, MIL 3 |
| 8 | N/A | N/A | Photographs of iPhone and iPad | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 802, 602, I, U, D, MIL 7, 402, 403, 1002, misleading, MIL 1 |
| 9 | N/A | N/A | Translation of email from Dong Jin Koh dated September 16, 2008 | SAMNDCA1137 4409 | SAMNDCA11374 414 | Karan Singh | Damages, willfulness, secondary considerations, utility patent claims, trade dress and design patent claims, copying. | | | lacks foundation, 802, misleading, lacks sponsoring witness, 602, MIL 6, translation, not disclosed in expert report, 402, 403, 702/703, MIL 1 |
| 10 | N/A | N/A | Design alternatives considered by P. Peter Bressler | N/A | N/A | Peter Bressler | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 602, I, U, D, 403, MIL 1, MIL 3 |
| 11 | N/A | N/A | iPhone and iPad Advertisements | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | lacks foundation, cumulative, 802, 602, I, U, MIL 1, 402, 403, D |
| 12 | N/A | N/A | iPhone Television Advertisements | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | lacks foundation, cumulative, 802, 602, I, U, MIL 1, 402, 403, D |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|----------|----------|-----------------------|--|--------|----------|---|
| 13 | N/A | N/A | iPad Television Advertisements | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | lacks foundation, cumulative, 802, 602, I, U, MIL 1, 402, 403, D |
| 14 | N/A | N/A | iPhone & iPad Appearances in Popular Media | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | lacks foundation, cumulative, misleading, 802, 602, I, U, MIL 1, 402, 403, D, lacks sponsoring witness |
| 15 | N/A | N/A | Apple's Sales of iPhone and iPad | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | lacks foundation, 802, 602, U, D, MIL 1, 402, 403, lacks sponsoring witness |
| 16 | N/A | N/A | iPhone and iPad marketing expenditures | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad | | | authenticity, lacks foundation, 802, 602, 1002, U, D, MIL 1, 402, 403, lacks sponsoring witness |
| 17 | N/A | N/A | Summary of iPhone and iPad News Coverage | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad, secondary considerations of non- obviousness, damages. | | | 802, 402, lacks foundation, 403, misleading, 1002, authenticity, incomplete, lacks sponsoring witness, 701, I, MIL 1, MIL 2, D, U, cumulative, 602, MIL 3 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|----------|----------|-----------------------|--|--------|----------|--|
| 18 | N/A | N/A | Apple market research | N/A | N/A | Philip Schiller | Offered to establish public awareness of the designs of the iPhone and iPad, secondary considerations of non- obviousness, damages. | | | 802, lacks foundation, 403, misleading, authenticity, lacks sponsoring witness, 602, D, MIL 1, U, 402, incomplete, I |
| 19 | N/A | N/A | Designs Considered by Apple | N/A | N/A | Scott Forstall | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 602, I, U, D, 403, incomplete, lacks sponsoring witness, MIL 1, MIL 3 |
| 20 | N/A | N/A | Design alternatives considered by A. Hedge | N/A | N/A | Alan Hedge | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 602, I, U, D, 403, misleading, MIL 1, MIL 3 |
| 21 | N/A | N/A | Screen captures considered by S. Kare | N/A | N/A | Susan Kare | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 802, 602, I, U, D, 402, 403, MIL 1, MIL 3 |
| 22 | N/A | N/A | Design alternatives considered by S. Kare | N/A | N/A | Susan Kare | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 403, 802, 602, I, U, D, MIL 1, MIL 3, includes references that have been stricken by Judge Grewal |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|----------|----------|-----------------------|--|--------|----------|--|
| 23 | N/A | N/A | Summary of Hal Poret's Secondary Meanings Surveys | N/A | N/A | Hal Poret | Offered in support of Apple's trade dress and design patent claims | | | 402, 802, 602, 702/703, U, D, 403, incomplete, MIL 2, MIL 3 |
| 24 | N/A | N/A | Summary of Kent Van Liere's Association/Co nfusion Surveys | N/A | N/A | Kent Van Liere | Offered in support of Apple's trade dress and design patent claims | | | 402, 802, 602, 702/703, U, D, 403, incomplete, MIL 2, MIL 3 |
| 25 | N/A | N/A | Summary of Apple's damages calculations | N/A | N/A | Terry Musika | Offered in support of Apple's trade dress and design patent claims, damages and secondary considerations | | | lacks foundation, 802, 403, misleading, overbroad, authenticity, lacks sponsoring witness, 602, MIL 8, D, U, 702/703, MIL 9, I |
| 26 | N/A | N/A | Summary of selected documents reflecting comments on demand for Apple's intellectual property | N/A | N/A | Terry Musika | Offered in support of Apple's trade dress and design patent claims, damages and secondary considerations | | | 402, lacks foundation, 802, 403, misleading, 1002, overbroad, authenticity, lacks sponsoring witness, 602, I, MIL 1, MIL 6, incomplete, D, U, 702/703, MIL 2 |
| 27 | N/A | N/A | Summary of selected documents reflecting comments on the smartphone and tablet marketplace | N/A | N/A | Terry Musika | Offered in support of Apple's trade dress and design patent claims, damages and secondary considerations | | | 402, lacks foundation, 802, 403, misleading, 1002, overbroad, authenticity, lacks sponsoring witness, 602, I, MIL 1, MIL 6, MIL 9, incomplete, D, U, 702/703, MIL 8, MIL 2, MIL 3 |

-8- Case No. Case No. 11-cv-01846-LHK SAMSUNG'S OBJECTIONS TO APPLE'S EXHIBIT LIST, PROPOSED JOINT EXHIBIT LIST AND DEPOSITION DESIGNATIONS

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|--|----------|----------|-----------------------|---|--------|----------|--|
| 28 | N/A | N/A | Summary of Samsung's fixed, variable, and non- product costs | N/A | N/A | Terry Musika | Damages | | | lacks foundation, 802, 403, misleading, 1002, authenticity, lacks sponsoring witness, 602, I, MIL 8, MIL 9, D, U, 402, 702/703 |
| 29 | N/A | N/A | Summary and comparison of Samsung financial data from different sources in Samsung's production | N/A | N/A | Terry Musika | Damages | | | 402, lacks foundation, 802, 403, misleading, 1002, authenticity, lacks sponsoring witness, 602, I, MIL 8, MIL 9, D, U, 702/703 |
| 30 | N/A | N/A | Summary of survey conducted by J. Hauser | N/A | N/A | John Hauser | Damages and secondary considerations. | | | 402, lacks foundation, 802, 403, misleading, 1002, authenticity, 602, D, MIL 1, incomplete, U, 702/703, MIL 2, MIL 3 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|---|---|---|---|--------|----------|---|
| 31 | N/A | N/A | Selection of Samsung source code from Bates range SAMNDCA- C000000001 - SAMNDCA- C000009221 | SAMNDCA- C000002368;SA MNDCA- C000002440;SA MNDCA- C000002481;SA MNDCA- C000002559; SAMNDCA- C000002807; SAMNDCA- C000003597;SA MNDCA- C000005715;SA MNDCA- C000006084; SAMNDCA- C000006277; SAMNDCA- C000006277; SAMNDCA- C00000501;SA MNDCA- C000007702; SAMNDCA- C000007890;SA MNDCA- C000007890;SA | SAMNDCA- C000002420;SAM NDCA- C000002529; SAMNDCA- C000002636;SAM NDCA- C000002636;SAM NDCA- C000003714;SAM NDCA- C000005969;SAM NDCA- C000006166;SAM NDCA- C000006166;SAM NDCA- C000006331; SAMNDCA- C000003549;SAM NDCA- C000003549;SAM NDCA- C000007786;SAM NDCA- C000008007;SAM NDCA- C000008007;SAM | Karan Singh; Ravin Balakrishnan | Offered in support of Apple's utility patent claims. | | | lacks sponsoring witness, D, MIL 6 |
| 32 | | | Video of iPhone Launch at Macworld 2007 | APLNDC- Y0000066914 | APLNDC- Y0000066914 | Boris Teksler | Damages, willfulness, secondary considerations. | | | 402, lacks foundation, 802, 403, misleading, 701, overbroad, authenticity, lacks sponsoring witness, 602, MIL 1 |
| 33 | | | Apple Design (Sabine Schulze & Ina Gratz eds.) | APLNDC- Y0000151129 | APLNDC- Y0000151450 | Philip Schiller; Christopher Stringer | Offered in support of Apple's trade dress and design patent claims | | | lacks foundation, 402, 802, 403, lacks sponsoring witness, MIL 1, MIL 2 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|------------------------------------|----------------|---|---------------------|---------------------|--|---|--------|----------|--|
| 34 | Ex. 1733; Ex. 2012; Ex. 2148 | 9/1/2007 | Translation of Presentation: Feasibility Review on Standalone AP Business for Smart Phone Market | SAMNDCA1080 9390 | SAMNDCA10809 460 | Terry Musika; Seogguen Kim; Dong Hoon Chang; Sungsik Lee | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, translation |
| 35 | Ex. 1394 | 12/14/20 08 | Email from J. Boltello re: Additional wallpapers for Genie | SAMNDCA1024 7689 | SAMNDCA10247 704 | Susan Kare | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, lacks sponsoring witness, 602, MIL 1, 402, 702/703, translation |
| 36 | Ex. 2006Ex. 1654 | 12/17/20 08 | Presentation: Touch Portfolio Rollout Strategy Recommendati on Based on Consumer Insight | SAMNDCA0019 1811 | SAMNDCA00191 987 | Peter Bressler; Russell Winer; Others | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 702/703, 602, MIL 2 |
| 37 | Ex. 2009Ex. 2151 | 12/24/20 08 | Translation of presentation:To uch Portfolio Key Takeaways | SAMNDCA1080 5169 | SAMNDCA10805 175 | Seogguen Kim; Sungsik Lee; Dong Hoon Chang; Won Pyo Hong; Dale Sohn | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 602, translation, MIL 2 |
| 38 | | 4/17/200 9 | Presentation: Browser Zooming Methods UX Exploration Study | SAMNDCA1110 4115 | SAMNDCA11104 139 | Karan Singh | Damages, willfulness, secondary considerations, utility patent claims, trade dress and design patent claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 702/703, 602, MIL 1 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|--|---------------|--|---------------------|---------------------|--------------------------------|---|--------|----------|---|
| 39 | Ex. 2641 | 9/9/2011 | Translation of Presentation:Al kon Instructions from the CEO | SAMNDCA2001 2936 | SAMNDCA20012 942 | Russell Winer | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 702/703, translation, 602 |
| 40 | Ex. 1352Ex. 1372Ex. 1977Ex. 2153 | 2/11/201 0 | Translation of Email from Bong-Hee Kim regarding Summary of Executive-Level Meeting Supervised by Head of Division (February 10) | SAMNDCA1024 7373 | SAMNDCA10247 378 | Russell Winer; Terry Musika | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 702/703, translation, 602 |
| 41 | Ex. 1667 | 7/30/201 2 | Presentation: Samsung TN GUI Framework Final Presentation | SAMNDCA1103 0081 | SAMNDCA11030 359 | Susan Kare | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, misleading, overbroad, lacks sponsoring witness, MIL 1, 402, 702/703, 602 |
| 42 | Ex. 2709 | 2/16/201 0 | Translation of Email from Hyun Kim regarding PI/P3 Division Head Design Report Meeting Minutes, dated February 16, 2010 | SAMNDCA0004 4700 | SAMNDCA00044 700 | Wong Pyo Hong | Damages, secondary considerations, design and trade dress claims, copying. | | | 802, lacks foundation, 403, 1002, misleading, incomplete, lacks sponsoring witness, 402, translation, 602, MIL 1, MIL 2 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|--|---------------|---|---------------------|---------------------|-----------------------|---|--------|----------|---|
| 43 | Ex. 1751 | 2/23/201 0 | Translation of Email from Ki Hyun Seo regarding Team Leader's Directives at the Executives' Meeting 2/22 (Mon) | SAMNDCA1016 7856 | SAMNDCA10167 857 | Wong Pyo Hong | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, 802, lacks foundation, 403, misleading, lacks sponsoring witness, MIL 1, translation, MIL 2 |
| 44 | Ex. 1194; Ex. 1506; Ex. 2007; Ex. 2126; Ex. 2155 | 3/2/2010 | Translation of Presentation: Relative Evaluation Report on S1, iPhone | SAMNDCA0020 3880 | SAMNDCA00204 010 | Susan Kare | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, lacks sponsoring witness, MIL 1, MIL 7, 702/703, translation, 602 |
| 45 | | 3/22/201 0 | Translation of selected pages from Presentation: The First Usability Evaluation Results for Sprint Bound Vins-Q (SPH- M910) | S-ITC- 000118719 | S-ITC-000118747 | Susan Kare | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, incomplete, lacks sponsoring witness, MIL 1, MIL 7, 702/703, translation, 602 |
| 46 | Ex. 2008 | 5/10/201 0 | Translation of selected pages from Presentation: Behold3 Usability Evaluation ResultsS/W Verification Group | SAMNDCA0050 8318 | SAMNDCA00508 400 | Ravin Balakrishnan | Damages, willfulness, secondary considerations, utility patent claims, trade dress and design patent claims, copying. | | | 402, lacks foundation, 802, 403, misleading, lacks sponsoring witness, MIL 1, MIL 2, translation, 702/703, incomplete, 602, authenticity |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|----------------------------|---------------|--|----------------------|----------------------|-----------------------|---|--------|----------|---|
| 47 | Ex. 2164 | 5/24/201 0 | Translation of Email from Saejin Cha regarding China GDI evaluation and attachments | SAMNDCA1015 9856 | SAMNDCA10159 871 | Dong Hoon Chang | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, MIL 1, MIL 7, lacks sponsoring witness, translation, 602 |
| 48 | | 7/5/2010 | Presentation: Wave & Galaxy S Expert & regular users UX Critique | SAMNDCA1129 0567 | SAMNDCA11290 652 | Dong Hoon Chang | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 602, incomplete, MIL 1, MIL 2, MIL 7, not disclosed in expert report, 602, lacks sponsoring witness |
| 49 | | | Apple Intelligence Report: Samsung Telecom Research Israel | SAMNDCA0038 7536 | SAMNDCA00387 585 | Karan Singh | Damages, willfulness, secondary considerations, utility patent claims, copying. | | | 402, lacks foundation, 802, 403, 602, misleading, lacks sponsoring witness, MIL 1, MIL 2, 702/703 |
| 50 | | | Best Buy Advertisement, "Samsung Galaxy Tab included with Selected Samsung HDTVs" | N/A | N/A | Terry Musika | Damages, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 1002, lacks sponsoring witness, MIL 1, MIL 7, U, authenticity, MIL 2 |
| 51 | Ex. 11; Wagner Ex. 8 | 10/5/201 0 | Presentation: Samsung-Apple Licensing Discussion, October 5, 2010 | APLNDC000001 0886 | APLNDC0000010 903 | Richard Lutton | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 105, 402, 403, 802, MIL 1, MIL 2 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|------------------------|---------------|--|---------------------|---------------------|-------------------------------|---|--------|----------|---|
| 52 | Ex. 5 | 8/4/2010 | Presentation: Samsung's Use of Apple Patents in Smartphones | APLNDC000011 03 | APLNDC0000119 2 | Richard Lutton | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 602, incomplete, MIL 1, MIL 7, 408, D, lacks sponsoring witness |
| 53 | Ex. 2022Ex. 2117 | | Translation of Presentation: Comparison of Galaxy S and iPhone 4 | SAMNDCA1101 0883 | SAMNDCA11010 884 | Seogguen Kim; Minhyouk Lee | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, MIL 7, translation, incomplete, 602, lacks sponsoring witness, MIL 1 |
| 54 | Ex. 2652 | 11/1/201 0 | Presentation: Lessons from AppleBoston Consulting Group | SAMNDCA0027 4819 | SAMNDCA00274 854 | Terry Musika | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, lacks sponsoring witness, MIL 1, 702/703, 602 |
| 55 | Ex. 1391 | | Presentation: Samsung mobile icon design for 2011 | SAMNDCA2000 7208 | SAMNDCA20007 222 | Susan Kare | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, lacks sponsoring witness, MIL 1, MIL 7, 702/703, 602 |
| 56 | | 2/11/201 1 | Presentation: Samsung Q4 '10 Deep Dive | SAMNDCA0052 6887 | SAMNDCA00526 993 | Peter Bressler | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, lacks sponsoring witness, MIL 1, MIL 2, 702/703, 602 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------------------------|-----------------|---|---------------------|---------------------|---------------------------------------|---|--------|----------|---|
| 57 | Ex. 2005Ex. 1517 | 4/9/2011 | Translation of selected pages from Presentation: P5 Usability Evaluation ResultsS/W Verification | SAMNDCA0017 6053 | SAMNDCA10765 466 | Ravin Balakrishnan | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, incomplete, lacks sponsoring witness, MIL 7, translation, 602, MIL 1 |
| 58 | Ex. 2651 | 6/17/201 1 | Group 1 Email from Justin Denison regarding GS Choi's Direction and Request to STA | SAMNDCA1037 5640 | SAMNDCA10375 662 | Terry Musika | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 1002, lacks sponsoring witness, MIL 1, MIL 9, 702/703, 602 |
| 59 | Ex. 1261Ex. 1353Ex. 1628 | August, 2011 | Translation of Presentation: North America P4(P7510 WiFi) BBY Retail Store Visit T/F Report | SAMNDCA1015 4003 | SAMNDCA10154 053 | Peter Bressler | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 1002, lacks sponsoring witness, MIL 1, MIL 7, MIL 2, translation, 702/703, 602 |
| 60 | Ex. 2647 | 2/16/201 2 | Presentation: STA Competitive Situation Paradigm Shift | SAMNDCA1154 7401 | SAMNDCA11547 470 | Terry Musika | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 1002, lacks sponsoring witness, MIL 1, MIL 9, 702/703, 602 |
| 61 | Ex. 1982 | 4/2/2012 | Translation of Presentation: Next Phase UX Direction through iPhone and TouchWiz Competitivenes s Analysis | SAMNDCA1099 8213 | SAMNDCA10998 232 | Ravin Balakrishnan; Sungsik Lee | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, translation, 702/703, 602, lacks sponsoring witness |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-------------------------|---------------|--|----------------------------|----------------------------|---|--|--------|----------|--|
| 62 | Vander Veen Ex. 9 | 3/25/201 1 | Presentation: iPhone 5 Counter Strategy | S-ITC- 003351732 | S-ITC-003351759 | Terry Musika; Justin Denison | Damages, willfulness, secondary considerations, design and trade dress claims, copying. | | | 402, lacks foundation, 802, 403, misleading, 1002, MIL 1, 702/703, 602, 802, lacks sponsoring witness |
| 63 | | | Source Code | APLNDC000001 4245 | APLNDC0000014 252 | Bas Ording; Scott Forstall; Ravin Balakrishnan | Offered in support of Apple's utility patent claims. | | | 402, 602, 802, incomplete, U, authenticity, misleading, lacks foundation, lacks sponsoring witness |
| 64 | | | Video of Samsung infringement of '381 patent | N/A | N/A | Ravin Balakrishnan | Offered in support of Apple's utility patent claims. | | | authenticity, misleading, lacks foundation, 1002, D, U, MIL 6, MIL 3 |
| 65 | | | Video of Samsung infringement of '163 patent | N/A | N/A | Karan Singh | Offered in support of Apple's utility patent claims. | | | authenticity, misleading, lacks foundation, 1002, D, U, MIL 6, MIL 3 |
| 66 | | | Video of Samsung infringement of '915 patent | N/A | N/A | Karan Singh | Offered in support of Apple's utility patent claims. | | | authenticity, misleading, lacks foundation, 1002, D, U, MIL 6, MIL 3 |
| 67 | | 4/4/2012 | Apple, Inc. Launch Date Net Sales by Adam Id (with ITS Billings) from 4/1/10 To 4/4/10 | APLNDC-WH-A- 0000029886 | APLNDC-WH-A- 0000029891 | Terry Musika | This exhibit is being offered as evidence of revenue earned by downloaded applications cited in Dr. O'Brien's expert report. | | | 402, lacks foundation, 802, 403, misleading, 1002, lacks sponsoring witness, 602 |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|--|------|--|--|--|--|--|--------|----------|--|
| 68 | Sung Ho Choi 6, 7; Seung Gun Park 12 | | Samsung WCDMA Release 7 Standardization Research Project Completion Report and English translation | SAMNDCA0016 6606; APLNDC- WH- A0000032261 | SAMNDCA00166 622; APLNDC- WH- A0000032278 | Sung Ho Choi or other Samsung Witness | This exhibit is being offered as evidence of Samsung's IPR policies and practices | | | translation, 602, 802, lacks foundation, lacks sponsoring witness |
| 69 | | | TSG-RAN WG1 Meeting #24, Tdoc R1-02- 0444, Orlando, Florida February 18-22, 2002, Text Proposal for Bit Distribution unit for HS-DSCH | APLNDC-WH- A0000011834 | APLNDC-WH- A0000011838 | Michael Walker; Richard Gitlin | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | |
| 70 | | | TSG-RAN WG1 meeting #7, TSGR1#7(99)d 84, Hannover, Germany, August 30 - September 3, 1999, Text proposal for Turbo codes and rate matching in TS 25.212, TS 25.222 (rev. of R1-99d56 | APLNDC-WH- A0000010518 | APLNDC-WH- A0000010533 | Michael Walker | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|---|--|---|--|--|--------|----------|---|
| 71 | H. Kim 1; Williams 1 | | 3GPP TS 25.214 v.6.6.0 | APLNDC-WH- A0000010733 | APLNDC-WH- A0000010790 | Hyong Kim | This exhibit is being offered as evidence of noninfringement of Samsung patent-in-suit U.S. Patent No. 7,447,516 | | | |
| 72 | | | Email from Beongjo Kim to 3GPP, dated July 9, 1999, attaching , TSGR1#6(99)8 92, Detailed Descriptions of Radio Frame Segmentation to 2nd Interleaver (Text Proposal) | APLNDC-WH- A000000998; APLNDC-WH- A0000010252 | APLNDC-WH- A0000009980; APLNDC-WH- A0000010257 | Michael Walker | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | 802, misleading, lacks foundation |
| 73 | Rosenbro ck 12; Stasik 13; Teece 18 | | 1st Expert Report of Hillebrand & Partners on FRAND | SAMNDCA0039 3932 | SAMNDCA00393 945 | Karl Heinz Rosenbrock or other Samsung Witness; Richard Donaldson | This exhibit is being offered as evidence concerning the ETSI IPR policy and FRAND licensing | | | 602, 802, misleading, lacks foundation, 402, 403, MIL 1, MIL 4 |
| 74 | Sung Ho Choi 8; Korea 1; Lichaber 10; Stasik 3; Teece 7 | | Addendum 1 ETSI/GA 29(97)/SCM/3, Amendments to the ETSI Interim Intellectual Property Rights Policy | APLNDC-WH- A0000012542 | APLNDC-WH- A0000012547 | Michael Walker; Sung Ho Choi or other Samsung Witness | This exhibit is being offered as evidence of Samsung's contractual obligations and its failure to timely disclose IPR to ETSI and3GPP | | | |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|-------------------|-------------|-------------|-----------------------|------------------|--------|----------|-----------------------|
| 75 | Lichaber | | ETSI Guide on | APLNDC-WH- | APLNDC-WH- | Michael Walker | This exhibit is | | | |
| | 12 | | Intellectual | A0000012460 | A0000012477 | | being offered as | | | |
| | | | Property Rights | | | | evidence of | | | |
| | | | (IPRs), dated | | | | Samsung's | | | |
| | | | November 27, | | | | contractual | | | |
| | | | 2008 | | | | obligations and | | | |
| | | | | | | | its failure to | | | |
| | | | | | | | timely disclose | | | |
| | | | | | | | IPR to ETSI | | | |
| | | | | | | | and3GPP | | | |
| 76 | | | FRE 1006 | N/A | N/A | Boris Teksler; | This exhibit is | | | 802, misleading, |
| | | | Summary of | | | BJ Watrous; | being offered as | | | lacks foundation, D |
| | | | Apple Licenses | | | Richard | evidence of | | | |
| | | | | | | Donaldson | Apple's licenses | | | |
| | | | | | | | and Samsung's | | | |
| | | | | | | | failure to offer | | | |
| | | | | | | | FRAND terms | | | |
| 77 | | | FRE 1006 | N/A | N/A | Richard | This exhibit is | | | 802, misleading, |
| | | | Summary of | | | Donaldson; | being offered as | | | lacks foundation, D |
| | | | Samsung | | | Seongwoo Kim | evidence of | | | |
| | | | Licenses | | | or other | Samsung's | | | |
| | | | | | | Samsung | licenses and its | | | |
| | | | | | | Witness | failure to offer | | | |
| | | | | | | | FRAND terms | | | |
| 78 | | | Intel Invoices to | APL794- | APL794- | Tony Blevins | This exhibit is | | | 602, 802, |
| | | | Apple | N000003905 | N000003910 | | being offered as | | | authenticity, lacks |
| | | | (12/22/11- | | | | evidence of | | | foundation |
| | | | 12/29/11) | | | | Apple's | | | |
| | | | | | | | purchases from | | | |
| | | | | | | | Intel | | | |
| 79 | | | Letter from B. | APL794- | APL794- | Boris Teksler; | This exhibit is | | | 602, 802, misleading, |
| | | | Teksler to SW | N0000015789 | N0000015791 | BJ Watrous | being offered as | | | lacks foundation, |
| | | | Kim, dated April | | | | evidence of | | | 402, 403, U |
| | | | 30, 2012 | | | | Samsung's | | | |
| | | | | | | | failure to offer | | | |
| | | | | | | | FRAND terms | | | |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|--|---|---|--|---|--------|----------|---|
| 80 | Seongwo o Kim 6, 82 | | Letter from SW Kim to B. Teksler, dated July 25, 2011 | SAMNDCA0032 2740 | SAMNDCA00322 741 | Boris Teksler; BJ Watrous; Seongwoo Kim | This exhibit is being offered as evidence of Samsung's failure to offer FRAND terms | | | 602, 802, misleading, lacks foundation |
| 81 | | | Patent Cross License Agreement between Intel and Samsung with Amendments 1 & 2 | S-794-ITC- 000000021 | S-794-ITC- 000000049 | Richard Donaldson; Seongwoo Kim or other Samsung Witness | This exhibit is being offered as evidence of Samsung's license with Intel | | | 802, misleading |
| 82 | Seongwo o Kim 57; Stasik 12; Teece 14; Donaldso n 9 | | Samsung presentation titled "Samsung - Motorola Licensing Discussions," dated May 2, 2005 | S-794-ITC- 005280718 | S-794-ITC- 005280737 | Richard Donaldson; Seongwoo Kim or other Samsung Witness | This exhibit is being offered as evidence of the value of Samsung's IPR and Samsung's failure to offer FRAND terms | | | 408, 802, misleading, lacks foundation |
| 83 | Van Lieshot 3; Van Der Velde 2; Soeng- Hun Kim 4; Holmes 5 | | 3GPP TSG- RAN WG2 Meeting #43, R2-021645, Prague, Czech Republic, August 15-20, 2004, L2 Considerations for VoIP Support | APLNDC- WH0000017799 | APLNDC- WH0000017802 | Michael Walker; Gert Jan Van Lieshot or other Samsung Witness | This exhibit is being offered as evidence of the existence of alternative technologies | | | lacks foundation, lacks sponsoring witness, authenticity, 602, 802 |
| 84 | | | 3GPP Website Screenshots | APLNDC-WH- A0000022854; APLNDC-WH- A0000022943 | APLNDC-WH- A0000022864; APLNDC-WH- A0000022945 | Michael Walker | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | 802, 602, lacks foundation |

-21- Case No. Case No. 11-cv-01846-LHK SAMSUNG'S OBJECTIONS TO APPLE'S EXHIBIT LIST, PROPOSED JOINT EXHIBIT LIST AND DEPOSITION DESIGNATIONS

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|---|---|---|---|--|--------|----------|------------------------------|
| 85 | | | Email from Jaeyol Kim to 3GPP, dated July 8, 1999, attaching TSGR1#6(99)9 15 | APLNDC-WH-A 0000012263; APLNDC-WH-A 0000012451 | APLNDC-WH-A 0000012263; APLNDC-WH-A 0000012456 | Wayne Stark; Michael Walker; Jae Yoel Kim or other Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | 802, 602, lacks foundation |
| 86 | Paul J. Farrell 10; Hee Won Kang 5; Michael Musella 3 | | File History for U.S. Patent No. 7,362,867 and English translation | APLNDC-WH- A0000017657;A PLNDC-WH- A0000031751 | APLNDC-WH- A0000018112; APLNDC-WH- A0000031790 | Wayne Stark | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | translation, authenticity |
| 87 | Ginkyu Choi 2; Hun-Kee Kim 2; Noh-Sun Kim 4; Jun-Sung Lee 2; Yong-Suk Moon 6; Jae- Seung Yoon 2; Paul J. Farrell 9; Michael Musella 7, Daniel Tierney 3, Richard Wesel 9 | | File History of U.S. Patent No. 792 [with certified English translation of Korean Application | APLNDC-WH- A0000017308; APLNDC-WH- A0000032329 | APLNDC-WH- A0000017614; APLNDC-WH- A0000032410 | Richard Gitlin | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | translation, authenticity |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|---|---------------------------|---------------------------|---|--|--------|----------|-------------------------------|
| 88 | Ginkyu Choi 4; Hun-Kee Kim 7; Noh-Sun Kim 2; Yong-Suk Moon 4 | | R1-01-1231, Siemens, "Interleaver operation inconjunction with SMP" | APLNDC-WH- A0000011745 | APLNDC-WH- A0000011748 | Richard Gitlin | This exhibit is being offered as evidence of the existence of alternative technologies | | | lacks foundation, 802, 602 |
| 89 | Chang- Soo Park 13; Hyeon- Woo Lee 15 | | TSG-RAN Working Group 1 meeting #7, TS GR1#7(99)d76, Hannover, Germany, August 30 - September 3, 1999, Text proposal for 25.212 | APLNDC-WH- A0000010046 | APLNDC-WH- A0000010063 | Michael Walker; Richard Gitlin; Chang-Soo Park or other Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | lacks foundation, 802, 602 |
| 90 | Hyeon Woo Lee 13 | | TSG-RAN WG1 meeting #6, TSGR1#7(99)b 32, Hannover, Germany, August 30 - September 3, 1999, Transport block concatenation and code block segmentation | APLNDC-WH- A0000011302 | APLNDC-WH- A0000011307 | Michael Walker; Richard Gitlin; Hyeon Woo Lee or other Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | lacks foundation, 802, 602 |
| 91 | Paul J. Farrell 8 | | File History for U.S. Patent No. 7,050,410 | APLNDC-WH- A0000013385 | APLNDC-WH- A0000014033 | Michael Walker; Jon Hamkins | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | authenticity |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|--|------|--|---------------------------|---------------------------|-------------------------|---|--------|----------|-------------------------------|
| 92 | Paul J. Farrell 15; Jon Hamkins 4; Se- Hyoung Kim 12; Paul Min 3 | | Nortel Networks, "Proposal for ratematching for turbo codes" to 3GPP | APLNDC- WH0000013765 | APLNDC- WH0000013769 | Jon Hamkins | This exhibit is being offered as evidence of the existence of alternative technologies | | | lacks foundation, 802, 602 |
| 93 | Se- Hyoung Kim 5 | | File History for U.S. Patent No. 7,386,001 (certified English translation of Korean application contained in file history, beginning at page 12844) | APLNDC-WH- A0000012550 | APLNDC-WH- A0000013076 | Venugopal Veeravalli | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | authenticity |
| 94 | Min-Goo Kim 6; Se- Hyoung Kim 11 | | Email from Tim Moulsley to 3GPP, Mar. 16, 1999 | APLNDC- WH0000000009 | APLNDC- WH0000000012 | Venugopal Veeravalli | This exhibit is being offered as evidence of the existence of alternative technologies | | | lacks foundation, 802, 602 |
| 95 | Williams 14 | | PCT Patent Application Publication No. 02/43332 - Petersen | APLNDC- WH0000019792 | APLNDC- WH0000019853 | Edward Knightly | This exhibit is being offered as invalidiating prior art to Samsung patent-in-suit U.S. Patent No. 7,675,941 | | | authenticity |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|----------------------------|------|--|---|---|-----------------------|---|--------|----------|------------------------------|
| 96 | Williams 19 | | U.S. Patent App. Pub. No. 2005/0213605 - Kim et al. | APLNDC-WH- A0000029791 | APLNDC-WH- A0000029812 | Edward Knightly | This exhibit is being offered as evidence of noninfringement of Samsung patent-in-suit U.S. Patent No. 7,675,941 | | | |
| 97 | Knightly 14 | | U.S. Patent No. 6,819,658 - Agarwal | APLNDC- WH0000019765 | APLNDC- WH0000019791 | Edward Knightly | This exhibit is being offered as invalidiating prior art to Samsung patent-in-suit U.S. Patent No. 7,675,941 | | | |
| 98 | Young Bum Kim 10 | | 3GPP TR 25.896 v.6.0.0 | APLNDC- WH0000010911 | APLNDC- WH0000011089 | Hyong Kim | This exhibit is being offered as invalidiating prior art to Samsung patent-in-suit U.S. Patent No. 7,447,516 | | | 802, 602, lacks foundation |
| 99 | | | 3GPP TS 25.214 v.6.1.0 | APLNDC- WH0000013124 | APLNDC- WH00000013187 | Hyong Kim | This exhibit is being offered as invalidiating prior art to Samsung patent-in-suit U.S. Patent No. 7,447,516 | | | 802, 602, lacks foundation |
| 100 | H. Kim 8; Williams 9 | | Japanese Patent Application No. 2002-190774 and English translation | APLNDC- WH0000011737; APLNDC- WH0000032288; APLNDC- WH0000012266 | APLNDC- WH0000011760;A PLNDC- WH0000032288; APLNDC- WH0000012277 | Hyong Kim | This exhibit is being offered as invalidiating prior art to Samsung patent-in-suit U.S. Patent No. 7,447,516 | | | translation, authenticity |

-25- Case No. Case No. 11-cv-01846-LHK SAMSUNG'S OBJECTIONS TO APPLE'S EXHIBIT LIST, PROPOSED JOINT EXHIBIT LIST AND DEPOSITION DESIGNATIONS

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|--|---------------------------|---------------------------|---|--|--------|----------|------------|
| 101 | Seong Hun Kim 12; Van Der Velde 6 | | 3GPP TSG- RAN WG2 Meeting #47 Tdoc R2- 051680, Athens, Greece, May 9- 13, 2005, Change Request | APLNDC-WH- A9301 | APLNDC-WH- A9310 | Edward Knightly; Michael Walker; Samsung witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | |
| 102 | Knightly 11; Williams 18; Seong Hun Kim 14; Lieshout 7; Van Der Velde 7 | | 3GPP TSG- RAN2 Meeting #47, Tdoc R2- 051311, Athens, Greece, May 9- 13, 2005, Segmentation and Concatenation for VoIMS | APLNDC-WH- A9816 | APLNDC-WH- A9820 | Edward Knightly; Michael Walker; Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | |
| 103 | Young Bum Kim 7; Kwak 12; Juho Lee 7; Joon Young Cho 7 | | 3GPP TSG- RAN WG1 Meeting #41, R1-050565, Athens, Greece, 9-13 May 2005, Change Request | APLNDC-WH- A0000011080 | APLNDC-WH- A0000011084 | Hyong Kim; Michael Walker; Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP | | | |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|------|--|-------------------------|-------------------------|----------------------------------|--|--------|----------|---|
| 104 | | | Email from Juho Lee to 3GPP, dated June 18, 2004, attaching R1- 040697, R1- 040689, R- 1040690, and R1-040696 | S-ITC- 001057684 | S-ITC-001057701 | Hyong Kim; Samsung Witness | This exhibit is being offered as evidence of Samsung's failure to timely disclose IPR to ETSI and 3GPP and the existence of alternative technologies | | | |
| 105 | Min 24 | | Intel X-GOLD 61x Product Specification | 750DOC001172 | 750DOC002698 | Richard Gitlin; Wayne Stark | This exhibit is being offered to demonstrate the functionality of the baseband processors used in the accused Apple products. | | | |
| 106 | Min 4 | | ANSI T1.413- 1995 - Network and Customer Installation Interfaces - Asymmetric Digital Subscriber Line (ADSL) Metallic Interface | APLNDC- WH0000014672 | APLNDC- WH0000014857 | Richard Gitlin | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No 6,928,604. | | | authenticity, 802, 602, lacks foundation |
| 107 | Chang- Soo Park 6Hyeon- Woo Lee 2Gitlin (5/4/12) 6Min 8 | | Bömer, L. et al., "A CDMA Radio Link with 'Turbo- Decoding': Concept and Performance Evaluation" (1995) | APLNDC- WH0000014905 | APLNDC- WH0000014910 | Richard Gitlin | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No 6,928,604. | | | authenticity, 802, 602, lacks foundation |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---|---|---|---|---|--|---|--------|----------|--|
| 108 | Wesel 4Hee Won Kang 3Jae Yoel Kim 2 | | TSG-RAN WG1 Meeting #5, TSGR1#5(99)7 24, Cheju Island, Korea, June 1-4, 1999, Multiple Scrambling Codes | APLNDC-WH- A12310 | APLNDC-WH- A12316 | Wayne Stark; Michael Walker; Samsung Witness | This exhibit is being offered as evidence of the existence of alternative technologies. | | | lacks foundation, 802, 602 |
| 109 | | | U.S. Patent No. 6,920,602 | APLNDC-WH- A16604 | APLNDC-WH- A16617 | Richard Gitlin | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | not disclosed in interrogatories |
| 110 | | 2003 | Apple schematics - P72C/73C Rev B & Q8 Main Logic Board Rev 05 | APLNDC-WH- A0000000001, APLNDC-WH- A0000000255 | APLNDC-WH- A0000000050, APLNDC-WH- A0000000266 | Emilie Kim | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,456,893. | | | 402, 403, 802, 602, lacks sponsoring witness |
| 111 | | Dates between 7/17/200 3 and 2005 | iBook/iSight Sales Data | APLNDC-WH- A24824 | APLNDC-WH- A24845 | Emilie Kim | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,456,893. | | | misleading, 402, 403, 802, 602, lacks sponsoring witness |
| 112 | Dourish 9 | 2/14/200 4 | KR 10-2004- 0013792 and English translation | APLNDC-WH- A0000009255; APLNDC-WH- A0000032322 | APLNDC-WH- A0000009261; APLNDC-WH- A0000032329 | Paul Dourish | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,456,893. | | | translation, 802, authenticity, lacks sponsoring witness |

-28- Case No. Case No. 11-cv-01846-LHK SAMSUNG'S OBJECTIONS TO APPLE'S EXHIBIT LIST, PROPOSED JOINT EXHIBIT LIST AND DEPOSITION DESIGNATIONS

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|---------------|--|---|---|--|--|--------|----------|--|
| 113 | | 3/8/2012 | Sony Ericsson Affidavit of Lee Hill with Attachment | APLNDC-WH- A000026930, APLNDC-WH- A000024792 | APLNDC-WH- A000026932, APLNDC-WH- A000024793 | Tony Givargis, Lee Hill, or Keeper of the Records, Sony Mobile Communication s | This exhibit is being offered to corroborate on sale date(s) of invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,698,711. | | | authenticity, misleading, 402, 403, 802, 602, lacks sponsoring witness |
| 114 | Givargis 13 | 3/18/201 2 | J2ME Tutorial: Introduction to J2ME, dated March 18, 2012 | APLNDC-WH- A25000 | APLNDC-WH- A25006 | Tony Givargis | This exhibit is being offered to corroborate the plain-meaning understanding of invalidating prior art to patent-in-suit U.S. Patent No. 7,698,711. | | | authenticity, misleading, lacks foundation, 802, 602, lacks sponsoring witness |
| 115 | Givargis 12 | 6/1/2003 | Mahmoud, "The J2ME Mobile Media API" published online at http://developer s. sun.com/mobilit y/ midp/articles/ mmapioverview (June 2003) | APLNDC- WH6738 | APLNDC- WH6749 | Tony Givargis | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,698,711. | | | authenticity, misleading, lacks foundation, 802, 602, lacks sponsoring witness |
| 116 | | 3/1/2004 | Sony Ericsson Mobile Comm. AB, "Sony K700 User Guide" (1st Ed.) March 2004 | APLNDC- WH8725 | APLNDC- WH8828 | Tony Givargis, Lee Hill, or Keeper of the Records, Sony Mobile Communication s | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,698,711. | | | authenticity, lacks foundation, 802, 602, lacks sponsoring witness |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|---------------------|----------------------------------|---|---|---|--|--|--------|----------|---|
| 117 | | 3/9/2004 and 3/21/200 4 | Sony Press Releases, dated March 9, 2004 and March 21, 2004 | APLNDC- WH0000008506, APLNDC- WH0000005351 | APLNDC- WH0000008507, APLNDC- WH0000005352 | Tony Givargis, Lee Hill, or Keeper of the Records, Sony Mobile Communication s | This exhibit is being offered to corroborate on sale date(s) of invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,698,711. | | | authenticity, lacks foundation, 802, 602, lacks sponsoring witness |
| 118 | Srivastav a - 14 | 12/28/19 99 | U.S. Patent No. 6,009,336 - Harris | APLNDC- WH6330 | APLNDC- WH6346 | Mani Srivastava | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,577,460. | | | |
| 119 | Srivastav a - 7 | 5/30/200 0 | U.S. Patent No. 6,069,648 - Suso | APLNDC- WH5303 | APLNDC- WH5317 | Mani Srivastava | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,577,460. | | | |
| 120 | Srivastav a - 22 | 2/10/200 4 | U.S. Patent No. 6,690,417 - Yoshida | APLNDC- WH5026 | APLNDC- WH5067 | Mani Srivastava | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,577,460. | | | |

-30- Case No. Case No. 11-cv-01846-LHK SAMSUNG'S OBJECTIONS TO APPLE'S EXHIBIT LIST, PROPOSED JOINT EXHIBIT LIST AND DEPOSITION DESIGNATIONS

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|------|---|---|--|---|--|--------|----------|---|
| 121 | | | Source Code Files, Camera and Photos Functionality (See Appendix 1 for Bates Numbers) | | | Emilie Kim; Paul Dourish; Mani Srivastava | This exhibit is being offered to demonstrate the cameras and photo and associated functionality of the accused Apple products. | | | lacks sponsoring witness, lacks foundation, authenticity, 402, 403, 802 |
| 122 | | | Samsung ETSI IPR Statements | APLNDC-WH- A0000009374; APLNDC-WH- A0000009375; APLNDC-WH- A0000009415; S-794-ITC 0005517177; APLNDC-WH- A0000009482 | APLNDC-WH- A0000009374; APLNDC-WH- A0000009396; APLNDC-WH- A0000009431; S- 794-ITC 0005517181; APLNDC-WH- A0000009486 | Seung Gun Park, Seung- Ho Ahn, Sung Ho Choi, or other Samsung Witness; Michael Walker | This exhibit is being offered as evidence of Samsung's contractual obligations and its failure to timely disclose IPR to ETSI and3GPP | | | |
| 123 | | | FRE 1006 Summary of 3GPP WG Meeting Minutes | N/A | N/A | Michael Walker | This exhibit is being offered as evidence of Samsung's failure timely to disclose IPR to ETSI and 3GPP | | | improper FRE 1006 summary, lacks foundation, 802, 602, misleading, not addressed in Walker's report or deposition, 403, 702/703, improper summary under Rule 1006, MIL 3, D, I |

| TRIAL EXH. NO. | DEPO EX. NO. | DATE | DESCRIPTION | BEGBATES | ENDBATES | SPONSORING WITNESS | PURPOSE | MARKED | ADMITTED | OBJECTIONS |
|----------------------|-----------------|----------|---|----------|----------|--|---|--------|----------|--|
| 124 | | 2003 | Apple iBook G3 800MHz laptop (2003) configured with an iSight video webcam (2003) running the Mac OS X 10.3 Panther (2003), and including Chat AV 2, iPhoto 2 and Preview 2.1.0 | | | Emilie Kim | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,456,893. | | | authenticity, misleading, lacks foundation, 402, 403, 802, 602, lacks sponsoring witness |
| 125 | | 3/1/2004 | Sony Ericsson K700i mobile phone | N/A | N/A | Tony Givargis, Lee Hill, or Keeper of the Records, Sony Mobile Communication s | This exhibit is being offered as invalidating prior art to Samsung patent-in-suit U.S. Patent No. 7,698,711. | | | lacks foundation, misleading, authenticity, 802, 602 |