

1 HAROLD J. MCELHINNY (SBN 66781)  
hmcelhinny@mofo.com

2 MICHAEL A. JACOBS (SBN 111664)  
mjacobs@mofo.com

3 RICHARD S.J. HUNG (SBN 197425)  
rhung@mofo.com

4 MORRISON & FOERSTER LLP  
 425 Market Street  
 San Francisco, California 94105-2482  
 Telephone: (415) 268-7000  
 Facsimile: (415) 268-7522

7 KENNETH H. BRIDGES (SBN 243541)  
kbridges@bridgesmav.com

8 MICHAEL T. PIEJA (SBN 250351)  
mpieja@bridgesmav.com

9 BRIDGES & MAVRAKAKIS LLP  
 3000 El Camino Real  
 One Palo Alto Square, 2nd Floor  
 Palo Alto, CA 94306  
 Telephone: (650) 804-7800  
 Facsimile: (650) 852-9224

15 Attorneys for Plaintiff  
 APPLE INC.

MARK D. SELWYN (SBN 244180)  
mark.selwyn@wilmerhale.com

WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 950 Page Mill Road  
 Palo Alto, California 94304  
 Telephone: (650) 858-6000  
 Facsimile: (650) 858-6100

WILLIAM F. LEE (*pro hac vice* anticipated)  
william.lee@wilmerhale.com

WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 60 State Street  
 Boston, MA 02109  
 Telephone: (617) 526-6000  
 Facsimile: (617) 526-5000

STEPHEN E. TAYLOR (SBN 58452)  
staylor@tcolaw.com

STEPHEN MCG. BUNDY (SBN 253017)  
sbundy@tcolaw.com

JOSHUA R. BENSON (SBN 269111)  
jbenson@tcolaw.com

TAYLOR & COMPANY LAW OFFICES, LLP  
 One Ferry Building, Suite 355  
 San Francisco, California 94111  
 Telephone: (415) 788-8200  
 Facsimile: (415) 788-8208

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 SAN JOSE DIVISION

20 APPLE INC.,

21 Plaintiff,

22 v.

23 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG  
 24 ELECTRONICS AMERICA, INC., a New  
 York corporation; and SAMSUNG  
 25 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,

26 Defendants.

Case No.: C-11-01846 (LHK)

**DECLARATION OF THOMAS C.  
 MAVRAKAKIS IN SUPPORT OF THE  
 OPPOSITION TO DEFENDANTS'  
 MOTION TO DISQUALIFY BRIDGES  
 & MAVRAKAKIS, LLP**

Date: August 24, 2011  
 Time: 2:00 p.m.  
 Place: Courtroom 8, 4<sup>th</sup> Floor

Honorable Lucy H. Koh

**REDACTED PUBLIC VERSION**

1 I, THOMAS C. MAVRAKAKIS, declare as follows:

2 1. I am a founding partner of the law firm Bridges & Mavrakakis, LLP, counsel for  
3 plaintiff Apple Inc. (“Apple”) in the above-captioned action. I have been a member of the Bridges  
4 & Mavrakakis LLP law firm since it first opened in 2010, and a litigator for more than fourteen  
5 years, with significant experience handling matters relating to patent litigation, licensing and  
6 counseling. The facts set forth in this declaration are personally known to me to be true, and if  
7 called upon to testify about the matters contained in this declaration, I could and would testify  
8 competently thereto.

9 2. This declaration is submitted in support of Apple’s Opposition to the Motion to  
10 Disqualify the Bridges & Mavrakakis LLP firm as counsel for plaintiff in this action that was filed  
11 on July 11, 2011 by defendants Samsung Electronics Co. Ltd., Samsung Electronics America,  
12 Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”).

13 3. Bridges & Mavakakis LLP (the “Bridges Firm”) was formed on September 1,  
14 2010. Immediately prior to founding the Bridges Firm, I was a partner in the Palo Alto office of  
15 the Houston-based law firm Wong Cabello LLP (March 2009 to September 2010). Prior to that, I  
16 was Director of Patent Strategy at Apple (or worked in that role as a consultant) from May 2006 to  
17 March 2009.

18 4. I have not represented Samsung as a client since the mid-1990s when I briefly (*i.e.*,  
19 for less than two weeks) represented Samsung in a litigation brought by Texas Instruments  
20 concerning Claude D. Head’s automated assembly line patents.

21 5. [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

27 6. The Bridges Firm does not represent Apple in connection with any of the  
28 affirmative claims that have been asserted by Samsung against Apple. I understand that the law

1 firm of Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”) has been hired to defend  
2 Apple against those claims. I have never advised Apple or consulted with any counsel at  
3 WilmerHale about any issues associated with Samsung’s assertion of its intellectual property  
4 rights against Apple products.

5           7. I have not provided any Samsung confidential information to Apple or to anyone  
6 representing Apple, including any attorneys, paralegals or staff affiliated with either the  
7 WilmerHale or the Morrison & Foerster LLP law firms.

8           I declare under penalty of perjury, under the laws of the United States of America, that the  
9 foregoing is true and correct. Executed this 1st day of August, 2011, at Palo Alto, California.

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/s/ Thomas C. Mavrakakis  
THOMAS C. MAVRAKAKIS

1 **ECF ATTESTATION**

2 I, Stephen E. Taylor, am the ECF User whose ID and password are being used to file this  
3 **DECLARATION OF THOMAS C. MAVRAKAKIS IN SUPPORT OF THE OPPOSITION**  
4 **TO DEFENDANTS' MOTION TO DISQUALIFY BRIDGES & MAVRAKAKIS, LLP.** In  
5 compliance with General Order 45, X.B., I hereby attest that Thomas C. Mavrakakis has  
6 concurred in this filing.

7  
8 Dated: August 1, 2011

TAYLOR & COMPANY LAW OFFICES, LLP

9  
10 By:                     /s/ Stephen E. Taylor                      
11                     Stephen E. Taylor