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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

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

Defendants.

Case No. 11-cv-01846-LHK

**DECLARATION OF MICHAEL A.
JACOBS IN OPPOSITION TO
SAMSUNG'S MOTION TO
DISQUALIFY BRIDGES &
MAVRAKAKIS LLP**

Date: August 24, 2011
Time: 2:00 p.m.
Place: Courtroom 4, 5th Floor
Judge: Hon. Lucy H. Koh

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I, Michael A. Jacobs, declare as follows:

1. I am a partner at Morrison & Foerster LLP. The facts set forth in this declaration are personally known to me to be true and, if called upon to testify as to the matters contained herein, I could and would competently testify thereto.

2. I am responsible for the team representing Apple in this action. In that capacity, I supervise communications with our client and with co-counsel on the matter, including Bridges & Mavrakakis. Based on that supervisory role, and further investigation I conducted, I have confirmed the following.

3. Morrison & Foerster has received no Samsung confidential information of any kind from Bridges & Mavrakakis.

4. Morrison & Foerster is Apple's lead counsel on Apple's affirmative intellectual property claims against Samsung in this matter. Wilmer Hale is lead counsel in defending Samsung's intellectual property claims brought against Apple in this matter.

5. Bridges & Mavrakakis's has worked with Morrison & Foerster on the preparation and prosecution of affirmative intellectual property claims against Samsung. Bridges & Mavrakakis is well-versed in Apple's intellectual property portfolio. Accordingly, Morrison & Forester relies on Bridges & Mavrakakis to assist us in efficiently forming an accurate understanding of Apple's intellectual property.

6. The affirmative claims Apple has brought against Samsung have been based on inspection of the accused products or on analysis of the products' Android open source software platform. Android source code is publicly available on the Internet.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of August, 2011.


Michael A. Jacobs