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**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.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S CORRECTED  
 OBJECTIONS AND  
 COUNTERDESIGNATIONS TO  
 SAMSUNG'S RULE 26(a)(3)  
 DEPOSITION DESIGNATIONS**

1 Apple submits the following corrected objections and counterdesignations to Samsung's  
2 amended deposition designations, filed on July 23, 2012 and as corrected on July 25, 2012.

3 **I. OBJECTIONS TO SAMSUNG'S DEPOSITION DESIGNATIONS**

4 Apple objects to Samsung's presentation of deposition testimony from:

- 5 • any Apple employee or expert witness who is available to testify live at trial, unless  
6 the testimony was provided under Rule 30(b)(6) of the Federal Rules of Civil  
7 Procedure or by a managing agent;
- 8 • any presently-employed Samsung employee on the ground that such employees are  
9 not unavailable to Samsung;
- 10 • any witness whose deposition took place after the fact discovery close, except  
11 depositions taken by agreement of the parties or under Court order in this action;
- 12 • any witness within the Court's subpoena powers under Rule 45(b)(2) and not under  
13 court order or prior agreement of the parties; and
- 14 • any Apple expert not listed in Apple's revised witness list, filed on July 23, 2012.

15 Apple's specific objections and counterdesignations to Samsung's individual deposition  
16 designations are contained in the attached Exhibit A.

17 Dated: July 28, 2012

MORRISON & FOERSTER LLP

18 By: /s/ Michael A. Jacobs  
Michael A. Jacobs

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20 By: /s/ Mark D. Selwyn  
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21 For Plaintiff APPLE INC.  
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