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14 Attorneys for SAMSUNG ELECTRONICS CO.,
15 LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19
20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

27 Defendant.

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF KARA M. BORDEN
IN SUPPORT OF SAMSUNG'S
OBJECTIONS TO APPLE'S PROPOSED
EXAMINATION EXHIBITS AND
MATERIALS FOR SECOND DAY OF
TRIAL**

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I, Kara M. Borden, declare as follows:

1. I am a member of the bar of the State of California and an associate at Quinn Emanuel Urquhart & Sullivan LLP, attorneys for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively, “Samsung”). I make this declaration of personal knowledge and could testify competently to the facts stated herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Samsung’s Objections to Apple’s Notice of Rule 30(B)(6) Deposition of Samsung Electronics Co., Ltd Relating to Apple’s Motion for a Preliminary Injunction.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the February 1, 2012 deposition of Qi Ling.

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the January 27, 2012 deposition of Jaegwan Shin.

5. Executed July 30, 2012, at San Jose, California.

/s/ Kara M. Borden
Kara M. Borden

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GENERAL ORDER ATTESTATION

I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Kara M. Borden.

/s/ Victoria Maroulis _____