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 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,
 19 Plaintiff,
 20 vs.
 21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF AUSTIN TARANGO
 IN SUPPORT OF SAMSUNG'S REPLY IN
 SUPPORT OF SAMSUNG'S MOTION TO
 DISQUALIFY BRIDGES &
 MAVRAKAKIS**

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

1 I, Austin Tarango, declare:

2 1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively “Samsung”). I have personal knowledge of the
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such
6 facts under oath.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the August 4, 2011
8 Northern District of California Order Granting Defendants’ Motion to Disqualify in Oliver v. SD-
9 3C, LLC et al., Case No. C 11-01260 JSW, Dkt. No. 70, as obtained through the ECF Website of
10 Northern District of California.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of the letter sent to Audrey
12 Hollins from the Office of The Chief Trial Counsel Enforcement of the State Bar of California
13 regarding the proposed changes to Professional Rule of Conduct 1.9 dated June 15, 2010, as
14 obtained through/published by State Bar of California on its website at the following address,
15 [http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsPropose](http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsProposed.aspx)
16 [d.aspx](http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsProposed.aspx).

17 4. Attached hereto as **Exhibit C** is a true and correct copy of California Proposed
18 Rule of Professional Conduct 1.2, Scope of Representation and Allocation of Authority Between
19 Client and Lawyer, as obtained through/published by State Bar of California on its website at the
20 following address,
21 [http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsPropose](http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsProposed.aspx)
22 [d.aspx](http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsProposed.aspx).

23 5. Attached hereto as **Exhibit D** is a true and correct copy of the February 5, 2010
24 draft of California Proposed Rule of Professional Conduct 1.2, including a comparison between
25 the proposed rule and the ABA Model rules, as obtained through/published by State Bar of
26 California on its website at the following address
27 [http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsPropose](http://ethics.calbar.ca.gov/Committees/RulesCommission/June25262010MeetingMaterialsProposed.aspx)
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1 d.aspx. This comparison identifies modifications to the ABA Model Rules made by the Ethics
2 Committee.

3 6. Attached hereto as **Exhibit E** is a true and correct copy of certain excerpts of the
4 transcripts of the hearing held on June 17, 2011 in this action.

5 7. Attached hereto as **Exhibit F** is a true and correct copy of certain excerpts of the
6 transcript of the deposition of Richard J. Lutton Jr. dated July 26, 2011.

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8 I declare under penalty of perjury that the foregoing is true and correct. Executed in
9 Redwood Shores, California on August 8, 2011.

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By /s/ Austin Tarango

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Austin Tarango

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