

EXHIBIT 1

**SUBJECT TO PROTECTIVE ORDER; CONTAINS HIGHLY CONFIDENTIAL –
OUTSIDE ATTORNEY’S EYES ONLY INFORMATION**

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11 Attorneys for Plaintiff and
12 Counterclaim-Defendant APPLE INC.

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 v.

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

24 Defendants.
25

Case No. 11-cv-01846-LHK (PSG)

**APPLE INC.’S CORRECTED
AMENDED OBJECTIONS AND
RESPONSES TO SAMSUNG
ELECTRONICS CO. LTD.’S
INTERROGATORY NOS. 4, 6, 7,
16, 17, 18 TO APPLE INC.**

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1 In accordance with Federal Rule of Civil Procedure 33(d), Apple refers to the following
2 documents because the burden of deriving or ascertaining the answer to this Interrogatory from
3 the produced business records is substantially the same for Apple as for Samsung: APLNDC-
4 X0000007220, APLNDC00013715, and APLNDC00013690.

5 **INTERROGATORY NO. 7:**

6 Separately for each of the APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS and
7 APPLE TRADEMARKS state all facts supporting any contention by APPLE that Samsung has
8 willfully infringed, diluted, or falsely designated the origin of its products for each patent, trade
9 dress, and trademark, including when and how APPLE asserts Samsung had actual notice of the
10 APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS, and APPLE TRADEMARKS.

11 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 7:**

12 Apple objects to this Interrogatory as overbroad, unduly burdensome, and not reasonably
13 calculated to lead to the discovery of admissible evidence. Apple objects to this Interrogatory as
14 premature to the extent that it: (a) conflicts with the schedule entered by the Court, (b) conflicts
15 with the obligations imposed by the Federal Rules of Civil Procedure, the Civil Local Rules
16 and/or the Patent Local Rules of this Court, and/or any other applicable rule; (c) seeks
17 information that is the subject of expert testimony; (d) seeks information and/or responses that are
18 dependent on the Court’s construction of the asserted claims of the patents-in-suit; or (e) seeks
19 information and/or responses that are dependent on depositions and documents that have not been
20 taken or produced. Apple further objects to this Interrogatory to the extent it seeks information
21 that: (i) requires the disclosure of information, documents, and things protected from disclosure
22 by the attorney-client privilege, work product doctrine, common interest doctrine, joint defense
23 privilege, or any other applicable privilege, doctrine, or immunity; (ii) would require Apple to
24 draw a legal conclusion to respond; (iii) is outside of Apple’s possession, custody, or control; or
25 (iv) can be obtained as easily by Samsung, is already in Samsung’s possession, or is publicly
26 available.

27 Subject to and incorporating its General Objections and its specific objections, Apple
28 responds as follows:

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1 announcement of the iPad, and it was put on notice of Apple’s distinctive iPad 2 Trade Dress
2 upon the announcement of the iPad 2. Samsung was put on notice of the marks shown in U.S.
3 Registration Nos. 3,886,196; 3,889,642; 3,886,200; 3,889,685; and 3,886,169 upon the
4 announcement of the original iPhone. Samsung was put on notice of the mark shown in U.S.
5 Registration No. 3,886,197 at least as early as June 19, 2009. Samsung was put on notice of the
6 Purple iTunes Store Trademark at least as early as June 2008. Samsung was put on notice of the
7 iTunes Eighth Note and CD Design Trademark at least as early as January 9, 2001.

8 In accordance with Federal Rule of Civil Procedure 33(d), Apple refers to the following
9 documents because the burden of deriving or ascertaining the answer to this Interrogatory from
10 the produced business records is substantially the same for Apple as for Samsung:

11 SAMNDCA00036232, SAMNDCA00176053, SAMNDCA00191811, SAMNDCA00196646,
12 SAMNDCA00201351, SAMNDCA00201771, SAMNDCA00202212, SAMNDCA00202336,
13 SAMNDCA00203016, SAMNDCA00203092, SAMNDCA00203268, SAMNDCA00203727,
14 SAMNDCA00203811, SAMNDCA00203880, SAMNDCA00214274, SAMNDCA00217372,
15 SAMNDCA00221705, SAMNDCA00228887, SAMNDCA00228934, SAMNDCA00228981,
16 SAMNDCA00229011, SAMNDCA00229396, SAMNDCA00229399, SAMNDCA00229410,
17 SAMNDCA00229440, SAMNDCA00229449, SAMNDCA00232190, SAMNDCA00237929,
18 SAMNDCA00237976, SAMNDCA00238251, SAMNDCA00238432, SAMNDCA00249029,
19 SAMNDCA00251506, SAMNDCA00507826, SAMNDCA00508318, SAMNDCA00512454,
20 SAMNDCA00514511, SAMNDCA00514571, SAMNDCA00515899, SAMNDCA00525347,
21 SAMNDCA00530675, SAMNDCA00533129, SAMNDCA00533366, SAMNDCA10042955,
22 SAMNDCA10154003, SAMNDCA10190890, SAMNDCA10244357, SAMNDCA10244604,
23 SAMNDCA10247373, SAMNDCA10247537, SAMNDCA10247549, SAMNDCA10275576,
24 SAMNDCA10403697, SAMNDCA10524415, SAMNDCA10806650, SAMNDCA10806707,
25 SAMNDCA10807316, SAMNDCA10807388, SAMNDCA10808682, SAMNDCA10809390,
26 SAMNDCA10809734, SAMNDCA10824971, all documents referenced in Apple’s briefing on
27 its motion for sanctions, all documents that Samsung has produced, and continues to produce,
28

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1 SAMNDCA00229410, SAMNDCA00229440, SAMNDCA00229449, SAMNDCA00232190,
2 SAMNDCA00237929, SAMNDCA00237976, SAMNDCA00238251, SAMNDCA00238432,
3 SAMNDCA00249029, SAMNDCA00251506, SAMNDCA00507826, SAMNDCA00508318,
4 SAMNDCA00512454, SAMNDCA00514511, SAMNDCA00514571, SAMNDCA00515899,
5 SAMNDCA00525347, SAMNDCA00530675, SAMNDCA00533129, SAMNDCA00533366,
6 SAMNDCA10042955, SAMNDCA10154003, SAMNDCA10190890, SAMNDCA10244357,
7 SAMNDCA10244604, SAMNDCA10247373, SAMNDCA10247537, SAMNDCA10247549,
8 SAMNDCA10275576, SAMNDCA10403697, SAMNDCA10524415, SAMNDCA10806650,
9 SAMNDCA10806707, SAMNDCA10807316, SAMNDCA10807388, SAMNDCA10808682,
10 SAMNDCA10809390, SAMNDCA10809734, SAMNDCA10824971, APLNDC-Y0000056158,
11 APLNDC-Y0000054603-55359, APLNDC-Y0000054364-54602, all documents referenced in
12 Apple’s briefing on its motion for sanctions, all documents that Samsung has produced, and
13 continues to produce, evidencing comparisons, analyses, studies, teardowns, and investigations of
14 Apple products, and other documents produced late by Samsung that Apple is still in the process
15 of reviewing.

16 Dated: March 9, 2012

MORRISON & FOERSTER LLP

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By: /s/ Richard S.J. Hung
RICHARD S.J. HUNG

Attorneys for Plaintiff
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