

EXHIBIT H

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

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Attorneys for Plaintiff and
Counterclaim-Defendant APPLE INC.

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

INTERROGATORY NO. 7:

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

OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 7:

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

Subject to and incorporating its General Objections and its specific objections, Apple 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

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

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

Dated: March 9, 2012

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.