

EXHIBIT M

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

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

**SAMSUNG'S NOTICE OF RULE 30(B)(6)
DEPOSITION OF APPLE RELATING TO
APPLE INC.'S MOTION FOR A
PRELIMINARY INJUNCTION**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30,
3 Defendants and Counterclaimants Samsung Electronics Co., Ltd., Samsung Electronics America,
4 Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”) will take the
5 deposition upon oral examination of Apple Inc. (“Apple”) pursuant to 30(b)(6) of the Federal
6 Rules of Civil Procedure. The deposition will commence on a mutually agreeable date at the
7 offices of Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin Dolphin Drive, Redwood Shores,
8 California, 94065 and will continue day-to-day until completed. The deposition will be taken by
9 a notary public or other authorized officer and will be videotaped and recorded stenographically.
10 Pursuant to Rule 30(b)(6), Apple shall designate one or more officers, directors, managing agents
11 or other persons who consent to testify on its behalf concerning each of the subjects set forth in
12 Exhibit A hereto.

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DATED: July 6, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Victoria F. Maroulis
Charles K. Verhoeven
Kevin P.B. Johnson
Victoria F. Maroulis
Michael T. Zeller
Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
INC., and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

1 **EXHIBIT A**

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3 **DEFINITIONS**

4 1. The terms “APPLE,” “PLAINTIFF,” “YOU,” and “YOUR” shall refer to Apple,
5 Inc., any predecessor or successor of Apple, Inc., and any past or present parent, division,
6 subsidiary, affiliate, joint venture, associated organization, director, officer, agent, employee,
7 consultant, staff member, or other representative of Apple, Inc., including counsel and patent
8 agents, in any country.

9 2. The term “DEFENDANTS” means Samsung Electronics Co., Ltd., Samsung
10 Electronics America, Inc., and Samsung Telecommunications America, LLC.

11 3. The terms “DOCUMENT” and “DOCUMENTS” shall have the broadest meaning
12 ascribed to it by the Federal Rule of Civil Procedure 34 and Federal Rule of Evidence 1001. This
13 includes copies which differ from the original in any way, including handwritten notations or other
14 written or printed matter. It also includes information stored electronically, whether in a
15 computer database or otherwise, regardless of whether such documents are presently also in non-
16 electronic form.

17 4. The term “RELATING” shall mean regarding, referring to, concerning,
18 mentioning, reflecting, pertaining to, evidencing, identifying, involving, describing, discussing,
19 commenting on, embodying, responding to, supporting, contradicting, containing, or constituting
20 (in whole or in part).

21 5. The term “DESIGN PATENTS” shall mean U.S. Design Patent Nos. D618,677,
22 D593,087 and D504,889 and all parents, progeny, continuations, applications, divisional
23 applications, reexaminations, or reissues thereof and all foreign counterpart applications and
24 patents which claim the same subject matter.

25 6. The term “’381 PATENT” shall mean U.S. Patent No. 7,469,381 and all parents,
26 progeny, continuations, applications, divisional applications, reexaminations, or reissues thereof
27 and all foreign counterpart applications and patents which claim the same subject matter.

1 7. “PRIOR ART” shall mean any reference, publication, patent, physical specimen,
2 use, invention by another, sale, offer for sale, or other activities that are relevant to the validity of
3 the DESIGN PATENTS or the ‘381 PATENT including anything that is relevant to the
4 patentability of any patent claim under 35 U.S.C. §§ 102 and 103. Prior Art is not limited to
5 references or other activities cited to the United States Patent and Trademark Office during
6 prosecution of any patent.

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TOPICS

9 1. The conception, diligence and reduction to practice of every claim in the DESIGN
10 PATENTS and the ‘381 PATENT, including the contribution(s) of each named inventor.

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12 2. The prosecution history of the DESIGN PATENTS and the ‘381 PATENT, any
13 foreign counterpart patent applications, and any related patent applications.

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15 3. The scope construction, meaning or interpretation of the DESIGN PATENTS and
16 the ‘381 PATENT.

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18 4. The functionality of any claimed feature, element or combination of elements in
19 any of the DESIGN PATENTS.

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21 5. PRIOR ART RELATING to the DESIGN PATENTS and the ‘381 PATENT.

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23 6. YOUR position that the Infuse 4G, Galaxy S 4G, and Droid Charge smartphones
24 and the Galaxy Tab 10.1 tablet computer infringe the DESIGN PATENTS and the ‘381 PATENT.

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26 7. YOUR awareness of any of DEFENDANTS’ products that YOU claim infringes
27 any of the DESIGN PATENTS or the ‘381 PATENT.

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1 8. Identification of YOUR position regarding whether third-parties' electronic devices
2 infringe any of the DESIGN PATENTS or the '381 PATENT and factual bases of YOUR
3 position.

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5 9. Apple's communications with DEFENDANTS relating to the subjects of Apple's
6 Motion for a Preliminary Injunction dated July 1, 2011.

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8 10. Apple's communications with DEFENDANTS RELATING to the DESIGN
9 PATENTS, the '381 PATENT, or any other patents.

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11 11. YOUR contention that Apple will be irreparably harmed in the absence of a
12 preliminary injunction.

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14
15 DATED: July 6, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

16
17
18 By /s/ Victoria F. Maroulis
19 Charles K. Verhoeven
20 Kevin P.B. Johnson
21 Victoria F. Maroulis
22 Michael T. Zeller
23 Attorneys for SAMSUNG ELECTRONICS CO.,
24 LTD., SAMSUNG ELECTRONICS AMERICA,
25 INC., and SAMSUNG
26 TELECOMMUNICATIONS AMERICA, LLC
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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2011, I caused **SAMSUNG’S NOTICE OF RULE 30(B)(6) DEPOSITION OF APPLE RELATING TO APPLE INC.’S MOTION FOR A PRELIMINARY INJUNCTION** to be electronically served on the following via email:

- ATTORNEYS FOR APPLE INC.**
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I declare under penalty of perjury that the foregoing is true and correct.

/s/Erik Olson
Erik Olson