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16	AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC	
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18	UNITED STATES	DISTRICT COURT
19	NORTHERN DISTRICT OF CA	LIFORNIA, SAN JOSE DIVISION
20	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK
	Plaintiff,	
21	vs.	DECLARATION OF TIM ROWDEN IN SUPPORT OF SAMSUNG'S OPPOSITION
22 23	SAMSUNG ELECTRONICS CO., LTD., a	TO APPLE'S MOTION FOR A PERMANENT INJUNCTION AND
	Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New	DAMAGES ENHANCEMENT, AND APPLE'S MOTION FOR JUDGMENT AS
24	York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA,	A MATTER OF LAW (RENEWED), NEW TRIAL, AND AMENDED JUDGMENT
25	LLC, a Delaware limited liability company,	
26 27	Defendants.	
27		
28 02198.51855/5016924.1		Case No. 11-cv-01846-LHK
02190.31033/3010924.1	ROWDEN DECLARATION ISO OPPOSITION TO ENHANCEMENT MOTION AND APPLE'S IMO	APPLE'S PERMANENT INJUNCTION AND DAMAGES L, NEW TRIAL, AND AMENDED JUDGMENT MOTION
		Dockets.Justia.com

1	DECLARATION OF TIM ROWDEN	
2	I, Tim Rowden, declare as follows:	
3	1. I am currently employed by Samsung Telecommunications America, LLC	
4	("STA") as the Vice President of Product Management. I make this declaration of personal,	
5	firsthand knowledge, and if called and sworn as a witness, I could and would testify as set forth	
6	below.	
7	2. As the Vice President of Product Management, I am familiar with and have	
8	knowledge of STA's sales of certain mobile devices.	
9	3. I understand that Samsung Electronics Co., Ltd. ("SEC") has developed	
10	design arounds for the '381, '163 and '915 patents.	
11	4. I understand that SEC began implementing the design around for the '381	
12	patent in its products by late 2011. The technical description of this design around is contained in	
13	the Declaration of Hee-chan Choi. This design around has been implemented in the Galaxy S II	
14	(T-Mobile) (Model No. SGH-T989) product that is still being sold. STA received approval from	
15	T-Mobile to implement the design around for the '381 patent in the Galaxy S II (T-Mobile)	
16	(Model No. SGH-T989) on September 28, 2011.	
17	5. I understand that SEC began implementing the design around for the '163	
18	patent in its products by March 2012. The technical description of this design around is contained	
19	in the Declaration of Hee-chan Choi. This design around has been implemented in the Galaxy S	
20	II (T-Mobile) (Model No. SGH-T989) product that is still being sold. STA received approval	
21	from T-Mobile to implement the design around for the '163 patent in the Galaxy S II (T-Mobile)	
22	(Model No. SGH-T989) on May 30, 2012.	
23	6. The design around for the '915 patent has been implemented in the Galaxy	
24	S II (T-Mobile) (Model No. SGH-T989) product that is still being sold. The technical description	
25	of this design around is contained in the Declaration of Hee-chan Choi. STA received approval	
26	from T-Mobile to implement the design around for the '915 patent in the Galaxy S II (T-Mobile)	
27	(Model No. SGH-T989) on September 28, 2012.	
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02198.51855/5016924.1	-1- Case No. 11-cv-01846-LHK	

1	7. As a consequence, the Galaxy S II (T-Mobile) (Model No. SGH-T989)	
2	product being sold by the date of the December 6, 2012 hearing will contain the design arounds	
3	described above.	
4	I declare under penalty of perjury under the laws of the United States of America	
5	that the foregoing is true and correct.	
6	Executed October 19, 2012, at Richardson, Texas.	
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28 02198.51855/5016924.1	-2- Case No. 11-cv-01846-LHK ROWDEN DECLARATION ISO OPPOSITION TO APPLE'S PERMANENT INJUNCTION AND DAMAGES ENHANCEMENT MOTION AND APPLE'S JMOL, NEW TRIAL, AND AMENDED JUDGMENT MOTION	