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13 Attorneys for SAMSUNG ELECTRONICS
 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,

CASE NO. 11-cv-01846-LHK

19 Plaintiff,

20 vs.

**DECLARATION OF EUNHA KIM IN
 SUPPORT OF SAMSUNG'S REPLY IN
 SUPPORT OF ITS MOTION TO
 DISQUALIFY BRIDGES &
 MAVRAKAKIS**

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,

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

24 Defendants.
 25



1 I, Eunha Kim, declare:

2 1. I am a director at Samsung Information Systems America, Inc., which is wholly
3 owned by Samsung Electronics America. Except as set forth below, I have personal knowledge
4 of the facts set forth in this declaration and, if called upon as a witness, I could and would testify
5 to such facts under oath.

6 2. From 2006 to 2010 I worked in the IP Legal Group of Samsung Electronics Co. Ltd.
7 In my position I worked closely with both in-house Samsung attorneys and Samsung's outside
8 counsel. During this period I was assigned to work on the following matters for Samsung
9 against Ericsson (the "Ericsson litigations"):

- 10 • *Ericsson Inc., Telefonaktiebolaget Lm Ericsson, Sony Ericsson Mobile*
11 *Communications AB, And Sony Ericsson Mobile Communications (USA) Inc. v.*
12 *Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., And Samsung*
Telecommunications America LLP, Case No. 2:06-cv-00063
- 13 • Wireless Communication Devices, Components Thereof, and Products Containing
14 Same, 337-TA-583, U.S. International Trade Commission
- 15 • Wireless Communication Equipment, Articles Therein, and Products Containing
16 the Same, 337-TA-577, U.S. International Trade Commission

17 3. I was in charge of patent litigations involving any telecommunication product of
18 Samsung worldwide, including United States. I was also in charge of supervising my teams in
19 the IP Legal Group. For the Ericsson litigations, I attended most face-to-face meetings and day-
20 to-day conference calls with outside counsel and corresponded regularly with outside counsel.

21 4. At the time of the *Ericsson* Litigations, Mr. Pieja was an associate at the law firm
22 of Kirkland & Ellis, LLP. As an associate working on the *Ericsson* litigation, his contact with
23 internal Samsung employees and attorneys was limited.

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

REDACTED

10 7. None of these five Samsung employees were involved with any of the Ericsson
11 litigations.

12 8. To the best of my information and belief, until June 16, 2011, when Mr. Bridges
13 and Mr. Pieja entered appearances on behalf of Apple in this litigation, no one at Samsung realized
14 that the same attorneys who had previously represented Samsung in the *Ericsson* litigations were
15 now representing Apple against Samsung.

16
17 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
18 Jose, California on August 8, 2011.

19
20
21
22 By  _____

Eunha Kim

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26 ¹ Both [REDACTED] and [REDACTED] are currently employed at Samsung Mobile
27 Display, and not currently Samsung Electronics Co. Ltd. employees, but both were employees of
28 Samsung Electronics Co., LTD at the time of the September 2010 meeting.

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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to e-file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Eunha Kim has concurred in this filing.

/s/ Victoria Maroulis