

Exhibit B

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APPLE INC.

17
18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN JOSE DIVISION

21 APPLE INC., a California corporation,

22 Plaintiff,

23 v.

24 SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
25 ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
26 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

27 Defendants.
28

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Case No. 11-cv-01846-LHK

**APPLE INC.'S INTERROGATORIES TO
DEFENDANTS RELATING TO APPLE'S
MOTION FOR A PRELIMINARY
INJUNCTION – SET ONE**

1 APPLE INC. (“Apple”) hereby requests, pursuant to Rules 26 and 33 of the Federal Rules
2 of Civil Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS
3 AMERICA, INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC,
4 (“Defendants”) respond to Apple’s Interrogatories Relating to Apple’s Motion for a Preliminary
5 Injunction. Apple requests that Defendants answer each interrogatory below and serve their
6 answers on Apple’s counsel at the offices of Morrison & Foerster, LLP, 425 Market St., San
7 Francisco, CA 94105-2482 within fourteen (14) days, or such other time as the parties agree or
8 the Court orders.

9 **DEFINITIONS**

10 The words and phrases used in these Requests shall have the meanings ascribed to them
11 under the Federal Rules of Civil Procedure and the Local Rules of the United States District
12 Court for the Northern District of California. In addition, the following terms shall have the
13 meanings set forth below whenever used in any Request.

14 1. “You” and/or “your” mean Defendants and all predecessors, successors,
15 predecessors-in-interest, successors-in-interest, subsidiaries, divisions, parents, and/or affiliates,
16 past or present, any companies that have a controlling interest in Defendants, and any current or
17 former employee, officer, director, principal, agent, consultant, sales representative, or attorney
18 thereof.

19 2. “Products at Issue” means the Samsung Galaxy S 4G, Infuse 4G, Droid Charge,
20 and Galaxy Tab 10.1, as released anywhere in the world.

21 3. “Document(s)” has the broadest possible meaning permitted by Federal Rules of
22 Civil Procedure Rules 26, 33 and 34 and the relevant case law. “Document(s)” also includes all
23 drafts or non-final versions, alterations, modifications, and amendments to any of the foregoing.

24 4. “Identify” means (1) when referring to a person, the person’s full name, present or
25 last known address and telephone number, and the last known title and place of employment; (2)
26 when referring to nonpatent documents, the production number or type of document, its general
27 nature and subject matter, date of creation, and all author(s), addresses(s), and recipient(s); and
28 (3) when referring to patent documents, the country, patent and/or application number, dates of

1 filing, publications, and grant, and the names of patentees or applicants.

2 **INTERROGATORIES**

3 **INTERROGATORY NO. 1:**

4 For each of the Products at Issue, describe any analysis, review, consideration, or copying
5 of, or comparison against, any Apple product or product feature in designing or developing, or
6 implementing a feature on, the Product at Issue, and identify all documents and things relating to
7 your response, and any persons with knowledge regarding your response.

8 Dated: July 12, 2011

MORRISON & FOERSTER LLP

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10
11 By: /s/ Richard S.J. Hung

RICHARD S.J. HUNG

Attorneys for Defendant
APPLE INC.

1 **CERTIFICATE OF SERVICE**

2 I, Deok Keun Matthew Ahn, hereby certify that on July 12, 2011, true and correct
3 copies of the foregoing document were served on the following counsel of record at the
4 addresses and in the manner indicated:

5 **VIA ELECTRONIC MAIL**

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I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Deok Keun Matthew Ahn
Deok Keun Matthew Ahn