

Exhibit C

1 HAROLD J. MCELHINNY (CA SBN 66781)
hmcclhinny@mofo.com
2 MICHAEL A. JACOBS (CA SBN 111664)
mjacobs@mofo.com
3 MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
4 Telephone: (415) 268-7000
5 Facsimile: (415) 268-7522

6 MARK D. SELWYN (SBN 244180)
mark.selwyn@wilmerhale.com
7 WILMER CUTLER PICKERING
HALE AND DORR LLP
8 950 Page Mill Road
Palo Alto, California 94304
9 Telephone: (650) 858-6000
10 Facsimile: (650) 858-6100

11 WILLIAM F. LEE (*pro hac vice* anticipated)
william.lee@wilmerhale.com
12 WILMER CUTLER PICKERING
HALE AND DORR LLP
13 60 State Street
Boston, MA 02109
14 Telephone: (617) 526-6000
15 Facsimile: (617) 526-5000
16 Attorneys for Plaintiff
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

KENNETH H. BRIDGES (CA SBN 243541)
kbridges@bridgesmav.com
MICHAEL T. PIEJA (CA SBN 250351)
mpieja@bridgesmav.com
BRIDGES & MAVRAKAKIS LLP
3000 El Camino Real
One Palo Alto Square, 2nd Floor
Palo Alto, CA 94306
Telephone: (650) 804-7800
Facsimile: (650) 852-9224

Case No. 11-cv-01846-LHK

**APPLE INC.'S REQUESTS FOR
PRODUCTION OF DOCUMENTS
AND THINGS RELATING TO
APPLE'S MOTION FOR A
PRELIMINARY INJUNCTION – SET
ONE**

APPLE INC. (“Apple” or “Plaintiff”) hereby requests, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA, INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, (“Defendants”) respond to Apple’s Requests for Production of Documents Relating to Apple’s Motion for a Preliminary Injunction. Apple requests that Defendants produce for inspection and copying the documents and things set forth below at the offices of Morrison & Foerster, LLP, 425 Market St., San Francisco, CA 94105-2482 within twenty-three (23) days, or such other time as the parties agree or the Court orders.

DEFINITIONS

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

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

2. “Apple” means Apple Inc.

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

4. “Exterior Design” means a device’s casing, screen, bezel, buttons, ports, speaker, and speaker slots, and all hardware, insignia, or ornamentation thereon.

5. “Patents at Issue” means U.S. Design Patent Nos. D618,677, D593,087, and D504,889, and U.S. Patent No. 7,469,381.

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

7. “Relating” means regarding, referring to, concerning, mentioning, reflecting, pertaining to, evidencing, involving, describing, discussing, commenting on, embodying, responding to, supporting, contradicting, containing or constituting (in whole or in part), as the context makes appropriate.

8. The use of a verb in any tense shall be construed as the use of the verb in all other tenses.

9. The use of the singular form of any word includes the plural and vice versa.

10. “And” and “or” shall be construed conjunctively and disjunctively to acquire the broadest meaning possible.

INSTRUCTIONS

1. Each document is to be produced along with all non-identical drafts thereof in their entirety, without abbreviation or redaction.

2. All documents should be produced as maintained in the ordinary course of business.

3. If you withhold any documents on a claim of privilege, you must provide a statement of the claim of privilege and all facts relied upon in support of that claim as required by Rule 26(b)(5) of the Federal Rules of Civil Procedure.

4. Documents responsive to each Request must be produced in full and subject to any Request being narrowed by the parties' meeting and conferring regarding your corresponding requests to Plaintiff, if applicable.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1:

Documents relating to your analysis, review, consideration, or copying of, or comparison against, any Apple product or product feature in designing, developing, or implementing any feature of the Products at Issue, including (1) their Exterior Design; (2) functionality that allows for an image, list, or webpage to be scrolled beyond its edge until it is partially displayed; and (3) functionality that allows for an image, list, or webpage that is scrolled beyond its edge to scroll back or bounce back into place so that it returns to fill the screen.

REQUEST NO. 2:

Documents relating to the existence of and/or work conducted by any group within Defendants that analyzes, analyzed, considers, considered, copies, copied, compares, or compared any Apple product or product feature in developing one or more of the Products at Issue.

REQUEST NO. 3:

Documents relating to competition between Apple and Samsung products, including each version of the iPhone or iPad and any of the Products at Issue.

REQUEST NO. 4:

Documents sufficient to identify the respective markets of each of the Products at Issue.

REQUEST NO. 5:

Documents sufficient to identify the respective market shares of each of the Products at Issue.

REQUEST NO. 6:

Documents sufficient to identify the respective market share of each product that competes with the Products at Issue.

REQUEST NO. 7:

Documents sufficient to identify all projections you have reviewed or considered as to what the respective market share of each of the Products at Issue, and each product that competes with each of the Products at Issue, is likely to be at any future point.

REQUEST NO. 8:

Documents and things you allege are prior art to the Patents at Issue.

Dated: July 12, 2011

MORRISON & FOERSTER LLP

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**

6 **Charles K. Verhoeven**
charlesverhoeven@quinnemanuel.com
7 Quinn Emanuel Urquhart Oliver & Hedges, LLP
50 California Street, 22nd Floor
8 San Francisco, California 94111
Telephone: (415) 875-6600
9 Facsimile: (415) 875-6700

10 **Kevin P.B. Johnson**
kevinjohnson@quinnemanuel.com
11 **Victoria F. Maroulis**
victoriamaroulis@quinnemanuel.com
12 Quinn Emanuel Urquhart Oliver & Hedges, LLP
555 Twin Dolphin Drive 5th Floor
13 Redwood Shores, California 94065
Telephone: (650) 801-5000
14 Facsimile: (650) 801-5100

15 **Edward J. DeFranco**
eddefranco@quinnemanuel.com
16 Quinn Emanuel Urquhart Oliver & Hedges, LLP
335 Madison Avenue, 22nd Floor
17 New York, NY 10017
Telephone: (212) 849-7000
18 Facsimile: (212) 849-7100

19 **Michael Thomas Zeller**
michaelzeller@quinnemanuel.com
20 Quinn Emanuel Urquhart Oliver & Hedges, LLP
865 S. Figueroa Street, 10th Floor
21 Los Angeles, CA 90017
Telephone: (213) 443-3000
22 Facsimile: (213) 443-3100

23
24 I declare under the penalty of perjury that the foregoing is true and correct.

25 /s/ Deok Keun Matthew Ahn
26 Deok Keun Matthew Ahn
27
28