

Exhibit E

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

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
18

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
23 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
24 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

25 Defendant.
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S OBJECTIONS AND
RESPONSES TO APPLE'S REQUESTS
FOR PRODUCTION OF DOCUMENTS
AND THINGS RELATING TO APPLE'S
MOTION FOR A PRELIMINARY
INJUNCTION – SETS ONE (NOS. 1- 8)
AND TWO (NOS. 155-217)**

1 5. Samsung objects to the definition of “Samsung,” “You,” “Your,” and
2 “Defendants” as overly broad, unduly burdensome, vague, and as calling for documents or
3 information not in Samsung’s possession, custody, or control to the extent that it defines Samsung
4 to include “all predecessors, successors, predecessors-in-interest, successors-in-interest,
5 subsidiaries, divisions, parents, and/or affiliates, past or present, any companies that have a
6 controlling interest in Defendants, and any current or former employee, officer, director, principal,
7 agent, consultant, representative, or attorney thereof, or anyone acting on their behalf.”

8 6. Samsung objects to Apple’s definition of “Products at Issue” as overly broad and
9 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, insofar
10 as it seeks information about these products “as released anywhere in the world.”

11 7. Samsung objects to Apple’s definition of “Hardware Design” as overly broad,
12 vague, and ambiguous insofar as it includes “all hardware, insignia or ornamentation thereon.”

13 8. Samsung objects to the definition of “Relating” as overly broad.

14 9. Samsung objects to each document request to the extent it seeks documents more
15 readily available to Apple than to Samsung, or equally available to Apple as to Samsung,
16 including documents and things that are publicly available.

17 10. Samsung objects to each document request to the extent that it seeks the
18 confidential, proprietary and/or trade secret information of third parties, and to the extent it seeks
19 information subject to non-disclosure or other confidentiality agreements between Samsung and a
20 third party.

21 11. Samsung objects to each document request to the extent that it seeks documents
22 protected from disclosure by the constitutional and/or statutory privacy rights of third persons.

23 12. Samsung objects to each document request that alleges or implies Samsung
24 engaged in copying or other such activity as inappropriate harassment.

25 13. Samsung objects to each document request to the extent that it seeks documents
26 and things before Samsung is required to disclose such documents and things in accordance with
27 any applicable law, such as the Northern District of California Patent Local Rules.

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1 14. Samsung objects to each document request to the extent that it seeks a legal
2 conclusion.

3 15. Samsung objects to each document request to the extent that it seeks to impose any
4 requirement or discovery obligation greater or different than those imposed by the Federal Rules
5 of Civil Procedure.

6 16. Samsung further objects to several of these requests as improperly delayed. Apple
7 has known about the Court's discovery schedule relating to Apple's motion for a preliminary
8 injunction since July 18, 2011. While Apple had the opportunity to serve several of these
9 document requests at an earlier time, it waited until the last possible date under the Court's Order
10 to serve these requests. Several of these document requests seek information that Apple could
11 have requested at a much earlier date, and of those requests, none are dependent on any arguments
12 raised in Samsung's Opposition to Apple's preliminary injunction. Therefore, Samsung objects to
13 Apple's bad faith in delaying service of these requests.

14 17. Samsung's investigation and analysis of the facts and law pertaining to this lawsuit
15 is ongoing. Thus, Samsung's objections are made without prejudice to its right to subsequently
16 add, modify or otherwise change, correct, or amend these objections.

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SPECIFIC OBJECTIONS TO

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REQUESTS FOR PRODUCTION OF DOCUMENTS

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REQUEST FOR PRODUCTION NO. 1:

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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.

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 1:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 request as overbroad in that it is not reasonably limited as to the scope of documents and things it
9 seeks. Samsung further objects to this request as oppressive and harassing inasmuch as it implies
10 Samsung engaged in copying and other such activity.

11 Subject to these objections, Samsung will produce relevant, non-privileged documents
12 within its possession, custody, or control, if any, after conducting a reasonable search during the
13 preliminary injunction discovery phase.

14 **REQUEST FOR PRODUCTION NO. 2:**

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

18 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 2:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
24 burdensome, and/or would require undue expense to answer. Samsung further objects to the
25 request as overbroad in that it is not reasonably limited as to the scope of documents and things it
26 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production
27 No. 1. Samsung further objects to this request as oppressive and harassing inasmuch as it implies
28 Samsung engaged in copying and other such activity.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search during the
3 preliminary injunction discovery phase.

4 **REQUEST FOR PRODUCTION NO. 3:**

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

7 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 3:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
13 burdensome, and/or would require undue expense to answer. Samsung further objects the request
14 as vague and ambiguous. For example, the term “relating to competition” is vague and ambiguous
15 and Samsung will response based on its understanding of this term. Samsung further objects to
16 the request as overbroad in that it seeks documents and things that bear on occurrences in other
17 countries that are not at issue in this litigation. Samsung further objects to the request as
18 overbroad in that it seeks documents and things that pertain to products not at issue in this
19 litigation.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents
21 within its possession, custody, or control, if any, after conducting a reasonable search during the
22 preliminary injunction discovery phase.

23 **REQUEST FOR PRODUCTION NO. 4:**

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

25 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 4:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
3 burdensome, and/or would require undue expense to answer. Samsung further objects the request
4 as vague and ambiguous. For example, the term “respective market shares” is vague and
5 ambiguous and Samsung will response based on its understanding of this term. Samsung further
6 objects to the request as overbroad in that it seeks documents and things that bear on occurrences
7 in other countries that are not at issue in this litigation.

8 Subject to these objections, Samsung will produce relevant, non-privileged documents
9 within its possession, custody, or control, if any, after conducting a reasonable search during the
10 preliminary injunction discovery phase.

11 **REQUEST FOR PRODUCTION NO. 5:**

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

14 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 5:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
20 burdensome, and/or would require undue expense to answer. Samsung further objects the request
21 as vague and ambiguous and Samsung will response based on its understanding of this term. For
22 example, the term “respective market shares” is vague and ambiguous. Samsung further objects to
23 the request as overbroad in that it seeks documents and things that bear on occurrences in other
24 countries that are not at issue in this litigation.

25 Subject to these objections, Samsung will produce relevant, non-privileged documents
26 within its possession, custody, or control, if any, after conducting a reasonable search during the
27 preliminary injunction discovery phase.

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1 **REQUEST FOR PRODUCTION NO. 6:**

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

4 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 6:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
10 burdensome, and/or would require undue expense to answer. Samsung further objects the request
11 as vague and ambiguous. For example, the term “respective market shares” is vague and
12 ambiguous and Samsung will response based on its understanding of this term. Samsung further
13 objects to the request as overbroad in that it seeks documents and things that bear on occurrences
14 in other countries that are not at issue in this litigation.

15 Subject to these objections, Samsung will produce relevant, non-privileged documents
16 within its possession, custody, or control, if any, after conducting a reasonable search during the
17 preliminary injunction discovery phase.

18 **REQUEST FOR PRODUCTION NO. 7:**

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

22 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 7:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
28 burdensome, and/or would require undue expense to answer. Samsung further objects the request

1 as vague and ambiguous. For example, the term “respective market shares” is vague and
2 ambiguous and Samsung will response based on its understanding of this term. Samsung further
3 objects to the request as overbroad in that it seeks documents and things that bear on occurrences
4 in other countries that are not at issue in this litigation.

5 Subject to these objections, Samsung will produce relevant, non-privileged documents
6 within its possession, custody, or control, if any, after conducting a reasonable search during the
7 preliminary injunction discovery phase.

8 **REQUEST FOR PRODUCTION NO. 8:**

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

10 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 8:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request as premature to the extent it seeks documents and things inconsistent with the timeframes
18 set forth in the Northern District of California Patent Local Rules.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search during the
21 preliminary injunction discovery phase.

22 **REQUEST FOR PRODUCTION NO. 156:**

23 Things you allege that are “rectangular-shaped phone[s] with rounded corners, a dominant
24 display screen with narrow borders, a horizontally oriented and centered rounded speaker slot, and
25 minimal or non-existent physical navigation buttons” that existed before January 2007 as
26 described in your Opposition.

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1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 156:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it
4 seeks documents equally or more readily available to Apple than to Samsung. Samsung further
5 objects to the Request to the extent the requested documents are publicly available.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents
7 within its possession, custody, or control, if any, after conducting a reasonable search during the
8 preliminary injunction discovery phase.

9 **REQUEST FOR PRODUCTION NO. 157:**

10 All Documents relating to the “rectangular-shaped phone[s] with rounded corners, a
11 dominant display screen with narrow borders, a horizontally oriented and centered rounded
12 speaker slot, and minimal or non-existent physical navigation buttons” that existed before January
13 2007, as described in your Opposition.

14 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 157:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the request as overbroad in that it
20 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
21 seeks. Samsung further objects to the Request to the extent it seeks documents equally or more
22 readily available to Apple than to Samsung. Samsung further objects to the Request to the extent
23 the requested documents are publicly available.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents
25 within its possession, custody, or control, if any, after conducting a reasonable search during the
26 preliminary injunction discovery phase.

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1 **REQUEST FOR PRODUCTION NO. 158:**

2 All Documents relating to the design, development, or implementation of the following
3 features of the Products at Issue: (1) their Hardware Design; (2) the functionality that allows for a
4 list to be scrolled beyond its terminus or a document to be translated beyond its edge until the list
5 or document is partially displayed; and (3) functionality that allows for a list that is scrolled
6 beyond its terminus to scroll back or bounce back into place or for a document that is translated
7 beyond its edge to translate back or bounce back so that the list or document returns to fill the
8 screen.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 158:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
12 is vague and ambiguous with regard to the terms “Hardware Design,” “scrolled beyond its
13 terminus” or “translated beyond its edge.” Samsung further objects to the request as overbroad in
14 that it seeks “all” documents and is not reasonably limited as to the scope of documents and things
15 it seeks. Samsung further objects to this request because Apple has delayed serving this document
16 request, despite Apple’s earlier knowledge of the issues raised in the request and despite the fact
17 that Apple has known about the Court’s Order governing discovery relating to Apple’s motion for
18 a preliminary injunction since July 18, 2011.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search during the
21 preliminary injunction discovery phase.

22 **REQUEST FOR PRODUCTION NO. 159:**

23 Documents sufficient to identify the individuals who contributed to the design,
24 development, or implementation of the following features of the Products at Issue: (1) their
25 Hardware Design; (2) the functionality that allows for a list to be scrolled beyond its terminus or a
26 document to be translated beyond its edge until the list or document is partially displayed; and (3)
27 functionality that allows for a list that is scrolled beyond its terminus to scroll back or bounce back
28

1 into place or for a document that is translated beyond its edge to translate back or bounce back so
2 that the list or document returns to fill the screen.

3 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 159:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
6 is vague and ambiguous with regard to the terms “Hardware Design,” “scrolled beyond its
7 terminus” or “translated beyond its edge.” Samsung further objects to this request because Apple
8 has delayed serving this document request, despite Apple’s earlier knowledge of the issues raised
9 in the request and despite the fact that Apple has known about the Court’s Order governing
10 discovery relating to Apple’s motion for a preliminary injunction since July 18, 2011.

11 Subject to these objections, Samsung will produce relevant, non-privileged documents
12 within its possession, custody, or control, if any, after conducting a reasonable search during the
13 preliminary injunction discovery phase.

14 **REQUEST FOR PRODUCTION NO. 160:**

15 Documents sufficient to identify the date of the first design of the following features of the
16 Products at Issue: (1) their Hardware Design; (2) the functionality that allows for a list to be
17 scrolled beyond its terminus or a document to be translated beyond its edge until the list or
18 document is partially displayed; and (3) functionality that allows for a list that is scrolled beyond
19 its terminus to scroll back or bounce back into place or for a document that is translated beyond its
20 edge to translate back or bounce back so that the list or document returns to fill the screen.

21 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 160:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
24 is vague and ambiguous with regard to the terms “Hardware Design,” “scrolled beyond its
25 terminus” or “translated beyond its edge.” Samsung further objects to this request because Apple
26 has delayed serving this document request, despite Apple’s earlier knowledge of the issues raised
27 in the request and despite the fact that Apple has known about the Court’s Order governing
28 discovery relating to Apple’s motion for a preliminary injunction since July 18, 2011.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search during the
3 preliminary injunction discovery phase.

4 **REQUEST FOR PRODUCTION NO. 161:**

5 All Documents and things relating to the design of the Hardware Design of the Products at
6 Issue, including for example, CAD images or files, emails, notebooks, photographs, sketches,
7 design specifications, models, mock-ups, and other design documents.

8 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 161:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
11 is vague and ambiguous with regard to the term “Hardware Design.” Samsung further objects to
12 the Request as overbroad in that it is not limited to any reasonable time period and seeks
13 documents and things from time periods not at issue in this litigation. Samsung further objects to
14 the request as overbroad in that it seeks “all” documents and is not reasonably limited as to the
15 scope of documents and things it seeks. Samsung further objects to this request because Apple has
16 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
17 the request and despite the fact that Apple has known about the Court’s Order governing discovery
18 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search during the
21 preliminary injunction discovery phase.

22 **REQUEST FOR PRODUCTION NO. 162:**

23 Documents sufficient to show alternative Hardware Designs considered by Samsung
24 during the development of the Products at Issue.

25 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 162:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
28 is vague and ambiguous with regard to the term “Hardware Designs.” Samsung further objects to

1 the Request as overbroad in that it is not limited to any reasonable time period and seeks
2 documents and things from time periods not at issue in this litigation. Samsung further objects to
3 this request because Apple has delayed serving this document request, despite Apple’s earlier
4 knowledge of the issues raised in the request and despite the fact that Apple has known about the
5 Court’s Order governing discovery relating to Apple’s motion for a preliminary injunction since
6 July 18, 2011.

7 Subject to these objections, Samsung will produce relevant, non-privileged documents
8 within its possession, custody, or control, if any, after conducting a reasonable search during the
9 preliminary injunction discovery phase.

10 **REQUEST FOR PRODUCTION NO. 163:**

11 All Documents relating to functional and cost considerations that constrained or altered the
12 Hardware Design of the Products at Issue.

13 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 163:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
16 is vague and ambiguous with regard to the term “Hardware Design.” Samsung further objects to
17 the request as overbroad in that it seeks “all” documents and is not reasonably limited as to the
18 scope of documents and things it seeks. Samsung further objects to this request because Apple has
19 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
20 the request and despite the fact that Apple has known about the Court’s Order governing discovery
21 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

22 Subject to these objections, Samsung will produce relevant, non-privileged documents
23 within its possession, custody, or control, if any, after conducting a reasonable search during the
24 preliminary injunction discovery phase.

25 **REQUEST FOR PRODUCTION NO. 164:**

26 All Documents relating to aesthetic considerations relating to the Hardware Design of the
27 Products at Issue.

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1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 164:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
4 is vague and ambiguous with regard to the term “Hardware Design” and “aesthetic
5 considerations.” Samsung further objects to the request as overbroad in that it seeks “all”
6 documents and is not reasonably limited as to the scope of documents and things it seeks.
7 Samsung further objects to this request because Apple has delayed serving this document request,
8 despite Apple’s earlier knowledge of the issues raised in the request and despite the fact that Apple
9 has known about the Court’s Order governing discovery relating to Apple’s motion for a
10 preliminary injunction since July 18, 2011.

11 Subject to these objections, Samsung is willing to meet and confer with Apple about the
12 relevance and scope of the information sought by this request.

13 **REQUEST FOR PRODUCTION NO. 165:**

14 All Documents relating to the redesign of the Galaxy Tab 10.1 following Apple’s
15 announcement of the iPad 2 on or about March 2, 2011.

16 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 165:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
19 is vague and ambiguous with regard to the term “redesign.” Samsung objects to this Request to
20 the extent that it seeks to elicit information subject to and protected by the attorney-client
21 privilege, the attorney work-product doctrine, the joint defense privilege, the common interest
22 doctrine, and/or any other applicable privilege or immunity. Samsung further objects to the
23 request as overbroad in that it seeks “all” documents and is not reasonably limited as to the scope
24 of documents and things it seeks. Samsung further objects to this request because Apple has
25 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
26 the request and despite the fact that Apple has known about the Court’s Order governing discovery
27 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

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1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 166:**

4 All Documents to or from Lee Don-Joo relating to the redesign of the Galaxy Tab 10.1
5 following Apple's announcement of the iPad 2 on or about March 2, 2011.

6 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 166:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
9 is vague and ambiguous with regard to the term "redesign." Samsung objects to this Request to
10 the extent that it seeks to elicit information subject to and protected by the attorney-client
11 privilege, the attorney work-product doctrine, the joint defense privilege, the common interest
12 doctrine, and/or any other applicable privilege or immunity. Samsung further objects to the
13 request as overbroad in that it seeks "all" documents and is not reasonably limited as to the scope
14 of documents and things it seeks. Samsung further objects to this request because Apple has
15 delayed serving this document request, despite Apple's earlier knowledge of the issues raised in
16 the request and despite the fact that Apple has known about the Court's Order governing discovery
17 relating to Apple's motion for a preliminary injunction since July 18, 2011.

18 Subject to these objections, Samsung is willing to meet and confer with Apple about the
19 relevance and scope of the information sought by this request.

20 **REQUEST FOR PRODUCTION NO. 167:**

21 All Documents to the design of the user interface for each of the Products at Issue.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 167:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that it
25 is vague and ambiguous with regard to the term "user interface." Samsung further objects to the
26 request as overbroad in that it seeks "all" documents and is not reasonably limited as to the scope
27 of documents and things it seeks. Samsung further objects to this request because Apple has
28 delayed serving this document request, despite Apple's earlier knowledge of the issues raised in

1 the request and despite the fact that Apple has known about the Court’s Order governing discovery
2 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 168:**

6 All Documents relied on by Benjamin B. Bederson in his declaration submitted in support
7 of your Opposition.

8 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 168:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
14 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
15 seeks.

16 Subject to these objections, Samsung will produce relevant, non-privileged documents
17 within its possession, custody, or control, if any, after conducting a reasonable search during the
18 preliminary injunction discovery phase.

19 **REQUEST FOR PRODUCTION NO. 169:**

20 All prior expert reports and declarations submitted by Benjamin B. Bederson in other
21 litigation involving mobile devices or user interfaces.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 169:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
28 seeks “all” documents and is not reasonably limited as to the scope of documents and things it

1 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
2 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
3 discovery of admissible evidence. Where the requested documents have been publicly filed,
4 Samsung further objects to the request to the extent it seeks documents that are publicly available
5 and thus are equally or more readily available to Apple than to Samsung. Where the requested
6 documents have been filed under seal, Samsung further objects to the Request to the extent it
7 seeks documents containing confidential third party information, including information subject to
8 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
9 documents subject to a protective order.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 170:**

13 All trial and deposition transcripts from other litigation in which Benjamin B. Bederson
14 testified about mobile devices or user interfaces.

15 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 170:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
20 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
21 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
22 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
23 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
24 discovery of admissible evidence. Where the requested documents have been publicly filed,
25 Samsung further objects to the request to the extent it seeks documents that are publicly available
26 and thus are equally or more readily available to Apple than to Samsung. Where the requested
27 documents have been filed under seal, Samsung further objects to the Request to the extent it
28 seeks documents containing confidential third party information, including information subject to

1 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
2 documents subject to a protective order.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 171:**

6 All Documents relied on by Roger Fidler in his declaration submitted in support of your
7 Opposition.

8 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 171:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
14 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
15 seeks.

16 Subject to these objections, Samsung is willing to meet and confer with Apple about the
17 relevance and scope of the information sought by this request.

18 **REQUEST FOR PRODUCTION NO. 172:**

19 All Documents relating to Roger Fidler’s assertion that “Apple personnel were exposed to
20 my tablet ideas and prototypes” in his declaration submitted in support of your Opposition.

21 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 172:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
26 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
27 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
28

1 seeks. Samsung further objects to the request to the extent it seeks documents that are equally or
2 more readily available to Apple than to Samsung.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search during the
5 preliminary injunction discovery phase.

6 **REQUEST FOR PRODUCTION NO. 173:**

7 All documents relating to Roger Fidler’s assertion that he presented the 1990 Video
8 attached as Exhibit G to his declaration to “a group of executives at Knight-Ridder and to Alan
9 Kay [of Apple]” in the fall of 1990.

10 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 173:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
16 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
17 seeks. Samsung further objects to the request to the extent it seeks documents that are equally or
18 more readily available to Apple than to Samsung.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search during the
21 preliminary injunction discovery phase.

22 **REQUEST FOR PRODUCTION NO. 174:**

23 All documents relating to Roger Fidler’s assertion that “[m]ore than 200 copies of the 1994
24 video [attached as Exhibit L to his declaration] were distributed to various newspaper
25 organizations and media outlets.”

26 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 174:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
4 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
5 seeks.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents
7 within its possession, custody, or control, if any, after conducting a reasonable search during the
8 preliminary injunction discovery phase.

9 **REQUEST FOR PRODUCTION NO. 175:**

10 All documents relating to Roger Fidler’s claim that starting in 1994, he provided to
11 Toshiba “specifications that they could use to create a working electronic tablet.”

12 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 175:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
17 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
18 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
19 seeks. Samsung further objects to the Request to the extent it seeks documents containing
20 confidential third party information, including information subject to a non-disclosure or other
21 agreement between Samsung and a third party, or to the extent it seeks documents subject to a
22 protective order.

23 Subject to these objections, Samsung will produce relevant, non-privileged documents
24 within its possession, custody, or control, if any, after conducting a reasonable search during the
25 preliminary injunction discovery phase.

26 **REQUEST FOR PRODUCTION NO. 176:**

27 All non-disclosure agreements between Apple and Information Design Lab executed
28 before 1995.

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 176:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
7 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
8 seeks. Samsung further objects to the request to the extent it seeks documents that are equally or
9 more readily available to Apple than to Samsung.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 177:**

13 All non-disclosure agreements executed between Roger Fidler and Toshiba in connection
14 with Mr. Fidler’s alleged provision to Toshiba of “specifications that they could use to create a
15 working electronic tablet.”

16 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 177:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
21 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
22 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request to the extent it seeks documents containing
24 confidential third party information, including information subject to a non-disclosure or other
25 agreement between Samsung and a third party, or to the extent it seeks documents subject to a
26 protective order.

27 Subject to these objections, Samsung is willing to meet and confer with Apple about the
28 relevance and scope of the information sought by this request.

1 **REQUEST FOR PRODUCTION NO. 178:**

2 All prior expert reports and declarations submitted by Roger Fidler in other litigation
3 involving the “1981 Tablet,” the “1990 Tablet,” the “1994 Tablet,” and the “1996 Toshiba
4 Tablet,” as described in his declaration submitted in support of your Opposition.

5 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 178:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
11 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
12 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
13 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
14 discovery of admissible evidence. Where the requested documents have been publicly filed,
15 Samsung further objects to the request to the extent it seeks documents that are publicly available
16 and thus are equally or more readily available to Apple than to Samsung. Where the requested
17 documents have been filed under seal, Samsung further objects to the Request to the extent it
18 seeks documents containing confidential third party information, including information subject to
19 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
20 documents subject to a protective order.

21 Subject to these objections, Samsung is willing to meet and confer with Apple about the
22 relevance and scope of the information sought by this request.

23 **REQUEST FOR PRODUCTION NO. 179:**

24 All trial and deposition transcripts from other litigation in which Roger Fidler testified
25 about the “1981 Tablet,” the “1990 Tablet,” the “1994 Tablet,” and the “1996 Toshiba Tablet,” as
26 described in his declaration submitted in support of your Opposition.

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1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 179:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
7 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
8 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
9 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
10 discovery of admissible evidence. Where the requested documents have been publicly filed,
11 Samsung further objects to the request to the extent it seeks documents that are publicly available
12 and thus are equally or more readily available to Apple than to Samsung. Where the requested
13 documents have been filed under seal, Samsung further objects to the Request to the extent it
14 seeks documents containing confidential third party information, including information subject to
15 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
16 documents subject to a protective order.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 180:**

20 All Documents relied on by Nicholas P. Godici in his declaration submitted in support of
21 your Opposition.

22 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 180:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
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1 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
2 seeks.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search during the
5 preliminary injunction discovery phase.

6 **REQUEST FOR PRODUCTION NO. 181:**

7 All prior expert reports and declarations submitted by Nicholas P. Godici in other litigation
8 involving patent prosecution.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 181:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
15 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
16 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
17 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
18 discovery of admissible evidence. Where the requested documents have been publicly filed,
19 Samsung further objects to the request to the extent it seeks documents that are publicly available
20 and thus are equally or more readily available to Apple than to Samsung. Where the requested
21 documents have been filed under seal, Samsung further objects to the Request to the extent it
22 seeks documents containing confidential third party information, including information subject to
23 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
24 documents subject to a protective order.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the
26 relevance and scope of the information sought by this request.

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1 **REQUEST FOR PRODUCTION NO. 182:**

2 All trial and deposition transcripts from other litigation in which Nicholas P. Godici was an
3 expert.

4 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 182:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
10 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
11 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
12 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
13 discovery of admissible evidence. Where the requested documents have been publicly filed,
14 Samsung further objects to the request to the extent it seeks documents that are publicly available
15 and thus are equally or more readily available to Apple than to Samsung. Where the requested
16 documents have been filed under seal, Samsung further objects to the Request to the extent it
17 seeks documents containing confidential third party information, including information subject to
18 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
19 documents subject to a protective order.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 183:**

23 All Documents relied on by Andries Van Dam in his declaration submitted in support of
24 your Opposition.

25 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 183:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
3 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
4 seeks.

5 Subject to these objections, Samsung will produce relevant, non-privileged documents
6 within its possession, custody, or control, if any, after conducting a reasonable search during the
7 preliminary injunction discovery phase.

8 **REQUEST FOR PRODUCTION NO. 184:**

9 All prior expert reports and declarations submitted by Andries Van Dam in other litigation
10 involving utility patents.

11 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 184:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
17 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
18 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
19 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
20 discovery of admissible evidence. Where the requested documents have been publicly filed,
21 Samsung further objects to the request to the extent it seeks documents that are publicly available
22 and thus are equally or more readily available to Apple than to Samsung. Where the requested
23 documents have been filed under seal, Samsung further objects to the Request to the extent it
24 seeks documents containing confidential third party information, including information subject to
25 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
26 documents subject to a protective order.

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1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 185:**

4 All trial and deposition transcripts from other litigation in which Andries Van Dam was an
5 expert.

6 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 185:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
11 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
12 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
13 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
14 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
15 discovery of admissible evidence. Where the requested documents have been publicly filed,
16 Samsung further objects to the request to the extent it seeks documents that are publicly available
17 and thus are equally or more readily available to Apple than to Samsung. Where the requested
18 documents have been filed under seal, Samsung further objects to the Request to the extent it
19 seeks documents containing confidential third party information, including information subject to
20 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
21 documents subject to a protective order.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 186:**

25 All Documents relied on by Itay Sherman in his declaration submitted in support of your
26 Opposition.

27
28

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 186:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
7 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
8 seeks.

9 Subject to these objections, Samsung will produce relevant, non-privileged documents
10 within its possession, custody, or control, if any, after conducting a reasonable search during the
11 preliminary injunction discovery phase.

12 **REQUEST FOR PRODUCTION NO. 187:**

13 All prior expert reports and declarations submitted by Itay Sherman in other litigation
14 involving design patents.

15 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 187:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
20 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
21 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
22 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
23 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
24 discovery of admissible evidence. Where the requested documents have been publicly filed,
25 Samsung further objects to the request to the extent it seeks documents that are publicly available
26 and thus are equally or more readily available to Apple than to Samsung. Where the requested
27 documents have been filed under seal, Samsung further objects to the Request to the extent it
28 seeks documents containing confidential third party information, including information subject to

1 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
2 documents subject to a protective order.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 188:**

6 All trial and deposition transcripts from other litigation in which Itay Sherman was an
7 expert.

8 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 188:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
14 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
15 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
16 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
17 discovery of admissible evidence. Where the requested documents have been publicly filed,
18 Samsung further objects to the request to the extent it seeks documents that are publicly available
19 and thus are equally or more readily available to Apple than to Samsung. Where the requested
20 documents have been filed under seal, Samsung further objects to the Request to the extent it
21 seeks documents containing confidential third party information, including information subject to
22 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
23 documents subject to a protective order.

24 Subject to these objections, Samsung is willing to meet and confer with Apple about the
25 relevance and scope of the information sought by this request.

26 **REQUEST FOR PRODUCTION NO. 189:**

27 All Documents relied on by Michael J. Wagner in his declaration submitted in support of
28 your Opposition.

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 189:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
7 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
8 seeks.

9 Subject to these objections, Samsung will produce relevant, non-privileged documents
10 within its possession, custody, or control, if any, after conducting a reasonable search during the
11 preliminary injunction discovery phase.

12 **REQUEST FOR PRODUCTION NO. 190:**

13 To the extent not attached as an exhibit, hard copies of all Documents cited by Michael J.
14 Wagner in his declaration submitted in support of your Opposition. Documents responsive to this
15 Request include, but are not limited to, hard copies of all references cited in the footnotes of Mr.
16 Wagner’s declaration.

17 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 190:**

18 In addition to its Objections and Responses Common to All Requests for Production,
19 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
20 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
21 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
22 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
23 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
24 seeks. Samsung further objects to the request to the extent it seeks documents that are publicly
25 available and thus are equally or more readily available to Apple than to Samsung.

26 Subject to these objections, Samsung is willing to meet and confer with Apple about the
27 relevance and scope of the information sought by this request.

28

1 **REQUEST FOR PRODUCTION NO. 191:**

2 All prior expert reports and declarations submitted by Michael J. Wagner in other litigation
3 involving damages.

4 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 191:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
10 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
11 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
12 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
13 discovery of admissible evidence. Where the requested documents have been publicly filed,
14 Samsung further objects to the request to the extent it seeks documents that are publicly available
15 and thus are equally or more readily available to Apple than to Samsung. Where the requested
16 documents have been filed under seal, Samsung further objects to the Request to the extent it
17 seeks documents containing confidential third party information, including information subject to
18 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
19 documents subject to a protective order.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 192:**

23 All trial and deposition transcripts from other litigation in which Michael J. Wagner was an
24 expert.

25 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 192:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
3 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
4 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
5 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
6 discovery of admissible evidence. Where the requested documents have been publicly filed,
7 Samsung further objects to the request to the extent it seeks documents that are publicly available
8 and thus are equally or more readily available to Apple than to Samsung. Where the requested
9 documents have been filed under seal, Samsung further objects to the Request to the extent it
10 seeks documents containing confidential third party information, including information subject to
11 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
12 documents subject to a protective order.

13 Subject to these objections, Samsung is willing to meet and confer with Apple about the
14 relevance and scope of the information sought by this request.

15 **REQUEST FOR PRODUCTION NO. 193:**

16 All Documents relied on by Jeffrey Johnson in his declaration submitted in support of your
17 Opposition.

18 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 193:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
24 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
25 seeks.

26 Subject to these objections, Samsung will produce relevant, non-privileged documents
27 within its possession, custody, or control, if any, after conducting a reasonable search during the
28 preliminary injunction discovery phase.

1 **REQUEST FOR PRODUCTION NO. 194:**

2 All prior expert reports and declarations submitted by Jeffrey Johnson in other litigation
3 involving utility patents.

4 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 194:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
10 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
11 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
12 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
13 discovery of admissible evidence. Where the requested documents have been publicly filed,
14 Samsung further objects to the request to the extent it seeks documents that are publicly available
15 and thus are equally or more readily available to Apple than to Samsung. Where the requested
16 documents have been filed under seal, Samsung further objects to the Request to the extent it
17 seeks documents containing confidential third party information, including information subject to
18 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
19 documents subject to a protective order.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 195:**

23 All trial and deposition transcripts from other litigation in which Jeffrey Johnson was an
24 expert.

25 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 195:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
3 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
4 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
5 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
6 discovery of admissible evidence. Where the requested documents have been publicly filed,
7 Samsung further objects to the request to the extent it seeks documents that are publicly available
8 and thus are equally or more readily available to Apple than to Samsung. Where the requested
9 documents have been filed under seal, Samsung further objects to the Request to the extent it
10 seeks documents containing confidential third party information, including information subject to
11 a non-disclosure or other agreement between Samsung and a third party, or to the extent it seeks
12 documents subject to a protective order.

13 Subject to these objections, Samsung is willing to meet and confer with Apple about the
14 relevance and scope of the information sought by this request.

15 **REQUEST FOR PRODUCTION NO. 196:**

16 All native photographs of the Products at Issue, prior art, and Apple products taken in
17 support of your Opposition, regardless of whether the photographs were referenced, inserted, or
18 relied upon in your Opposition.

19 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 196:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
24 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
25 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
26 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
27 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
28

1 discovery of admissible evidence. Samsung also objects to this Request in that it seeks
2 photographs that were not referenced, inserted, or relied upon in Samsung's Opposition.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search during the
5 preliminary injunction discovery phase.

6 **REQUEST FOR PRODUCTION NO. 197:**

7 All Documents, including source code, relating to any art that Samsung alleges is relevant
8 to the validity of U.S. Patent No. 7,469,381, including LaunchTile and XNav.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 197:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
15 seeks "all" documents and is not reasonably limited as to the scope of documents and things it
16 seeks. Samsung further objects to the request to the extent it seeks information that Samsung has
17 already provided to Apple. Samsung also objects to the request to the extent it seeks documents
18 that are publicly available and thus are equally or more readily available to Apple than to
19 Samsung.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents
21 within its possession, custody, or control, if any, after conducting a reasonable search during the
22 preliminary injunction discovery phase.

23 **REQUEST FOR PRODUCTION NO. 198:**

24 All Documents relating to any instructions, manuals, guides, or other documentation for
25 LaunchTile and XNav.

26 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 198:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
4 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
5 seeks. Samsung further objects to the request to the extent it seeks information that Samsung has
6 already provided to Apple. Samsung also objects to the request to the extent it seeks documents
7 that are publicly available and thus are equally or more readily available to Apple than to
8 Samsung.

9 Subject to these objections, Samsung will produce relevant, non-privileged documents
10 within its possession, custody, or control, if any, after conducting a reasonable search during the
11 preliminary injunction discovery phase.

12 **REQUEST FOR PRODUCTION NO. 199:**

13 A device that runs LaunchTile.

14 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 199:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it seeks
20 documents that are not relevant to the claims or defenses of any party and/or not reasonably
21 calculated to lead to the discovery of admissible evidence. Samsung also objects to the request to
22 the extent it seeks documents that are publicly available and thus are equally or more readily
23 available to Apple than to Samsung.

24 Subject to these objections, Samsung has already made available for inspection a device
25 that runs LaunchTile and Apple has already inspected this device.

26 **REQUEST FOR PRODUCTION NO. 200:**

27 Source code for the Gallery, Contacts, and Browser applications on the Products at Issue.
28

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 200:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to the Request to the extent it seeks
4 documents containing confidential information, including information subject to the protective
5 order. Samsung further objects to this request because Apple has delayed serving this document
6 request, despite Apple's earlier knowledge of the issues raised in the request and despite the fact
7 that Apple has known about the Court's Order governing discovery relating to Apple's motion for
8 a preliminary injunction since July 18, 2011.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 201:**

12 Source code relating to features of the Products at Issue that Apple has alleged infringe
13 U.S. Patent No. 7,469,381.

14 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 201:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to the Request to the extent it seeks
17 documents containing confidential information, including information subject to the protective
18 order. Samsung further objects to this request because Apple has delayed serving this document
19 request, despite Apple's earlier knowledge of the issues raised in the request and despite the fact
20 that Apple has known about the Court's Order governing discovery relating to Apple's motion for
21 a preliminary injunction since July 18, 2011.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 202:**

25 Source code for any instructions relating to not illuminating part of the screens on the
26 Products at Issue while they are powered on.

27
28

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 202:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to the Request to the extent it seeks
4 documents containing confidential information, including information subject to the protective
5 order. Samsung further objects to this request because Apple has delayed serving this document
6 request, despite Apple's earlier knowledge of the issues raised in the request and despite the fact
7 that Apple has known about the Court's Order governing discovery relating to Apple's motion for
8 a preliminary injunction since July 18, 2011.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 203:**

12 Documents sufficient to show the operation and functionality of the AMOLED screens of
13 the Products at Issue.

14 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 203:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to the Request to the extent it seeks
17 documents containing confidential information, including information subject to the protective
18 order. Samsung further objects to this request because Apple has delayed serving this document
19 request, despite Apple's earlier knowledge of the issues raised in the request and despite the fact
20 that Apple has known about the Court's Order governing discovery relating to Apple's motion for
21 a preliminary injunction since July 18, 2011.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 204:**

25 All Documents relating to your analysis, review, consideration, or copying of, or
26 comparison against, any Apple product or product feature, including (1) their Hardware Design;
27 (2) the functionality that allows for a list to be scrolled beyond its terminus or a document to be
28 translated beyond its edge until the list or document is partially displayed; and (3) functionality

1 that allows for a list that is scrolled beyond its terminus to scroll back or bounce back into place or
2 for a document that is translated beyond its edge to translate back or bounce back so that the list or
3 document returns to fill the screen.

4 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 204:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
10 burdensome, and/or would require undue expense to answer. Samsung further objects the request
11 as vague and ambiguous and overbroad. For example, the terms “analysis, review, consideration
12 or copying” are vague and ambiguous and overbroad. Samsung further objects to the Request to
13 the extent it seeks documents that are not relevant to the claims or defenses of any party and/or not
14 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to
15 this request as oppressive and harassing inasmuch as it implies Samsung engaged in copying and
16 other such activity. Documents produced in response to this request, if any, do not constitute an
17 admission that Samsung “copied” any Apple product or feature. Samsung further objects to this
18 request because Apple has delayed serving this document request, despite Apple’s earlier
19 knowledge of the issues raised in the request and despite the fact that Apple has known about the
20 Court’s Order governing discovery relating to Apple’s motion for a preliminary injunction since
21 July 18, 2011.

22 Subject to these objections, Samsung will produce relevant, non-privileged documents
23 within its possession, custody, or control, if any, after conducting a reasonable search during the
24 preliminary injunction discovery phase.

25 **REQUEST FOR PRODUCTION NO. 205:**

26 All Documents relating to any statements made by you regarding Apple and the Products
27 at Issue.

28

1 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 205:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to this
8 Request as overbroad in that it seeks “all” documents and is not reasonably limited as to the scope
9 of documents and things it seeks. Samsung further objects the request as vague and ambiguous
10 and overbroad in asking for “any statements.” Samsung further objects to the Request as
11 overbroad in that it is not limited to any reasonable time period and seeks documents and things
12 from time periods not at issue in this litigation. Samsung further objects to the Request to the
13 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not
14 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to
15 this request because Apple has delayed serving this document request, despite Apple’s earlier
16 knowledge of the issues raised in the request and despite the fact that Apple has known about the
17 Court’s Order governing discovery relating to Apple’s motion for a preliminary injunction since
18 July 18, 2011.

19 Subject to these objections, Samsung is willing to meet and confer with Apple about the
20 relevance and scope of the information sought by this request.

21 **REQUEST FOR PRODUCTION NO. 206:**

22 All Documents relating to any customer surveys, studies, analyses or investigations
23 regarding the Products at Issue.

24 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 206:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
27 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
28 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other

1 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
2 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
3 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
4 reasonable time period and seeks documents and things from time periods not at issue in this
5 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
6 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
7 discovery of admissible evidence. Samsung further objects to this request because Apple has
8 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
9 the request and despite the fact that Apple has known about the Court’s Order governing discovery
10 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

11 Subject to these objections, Samsung is willing to meet and confer with Apple about the
12 relevance and scope of the information sought by this request.

13 **REQUEST FOR PRODUCTION NO. 207:**

14 All Documents identifying or analyzing the market or markets to which Samsung intends
15 to sell the Products at Issue.

16 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 207:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
21 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
22 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
24 reasonable time period and seeks documents and things from time periods not at issue in this
25 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
26 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
27 discovery of admissible evidence. Samsung further objects to this request because Apple has
28 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in

1 the request and despite the fact that Apple has known about the Court’s Order governing discovery
2 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 208:**

6 All Documents created within the last five years relating to Samsung’s actual or projected
7 smartphone market share.

8 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 208:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
14 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
15 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
16 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
17 discovery of admissible evidence. Samsung further objects to this request because Apple has
18 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
19 the request and despite the fact that Apple has known about the Court’s Order governing discovery
20 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

21 Subject to these objections, Samsung is willing to meet and confer with Apple about the
22 relevance and scope of the information sought by this request.

23 **REQUEST FOR PRODUCTION NO. 209:**

24 All Documents created within the last five years relating to Samsung’s actual or projected
25 tablet computer market share.

26 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 209:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
4 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
5 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
6 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
7 discovery of admissible evidence. Samsung further objects to this request because Apple has
8 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
9 the request and despite the fact that Apple has known about the Court’s Order governing discovery
10 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

11 Subject to these objections, Samsung is willing to meet and confer with Apple about the
12 relevance and scope of the information sought by this request.

13 **REQUEST FOR PRODUCTION NO. 210:**

14 All Documents created between 2008 and the present relating to Samsung’s expansion of
15 its U.S. market share for smartphones and tablet computers.

16 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 210:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
21 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
22 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
24 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
25 discovery of admissible evidence. Samsung further objects to this request because Apple has
26 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
27 the request and despite the fact that Apple has known about the Court’s Order governing discovery
28 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 211:**

4 All Documents relating to the development of the Products at Issue that mention or refer to
5 Apple or Apple products, including communications among or with your personnel that discuss
6 whether or how to copy any design, feature, or function of an Apple product. Documents
7 responsive to this Request include, but are not limited to, Documents related to the redesign of the
8 Products at Issue in light of Apple products.

9 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 211:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung objects to this Request on the grounds that it is vague
15 and ambiguous with regard to the term “redesign.” Samsung further objects to the Request to the
16 extent it is unduly burdensome, and/or would require undue expense to answer. Samsung further
17 objects to this request as oppressive and harassing inasmuch as it implies Samsung engaged in
18 copying and other such activity. Documents produced in response to this request, if any, do not
19 constitute an admission that Samsung “copied” any Apple product or feature. Samsung further
20 objects to this request because Apple has delayed serving this document request, despite Apple’s
21 earlier knowledge of the issues raised in the request and despite the fact that Apple has known
22 about the Court’s Order governing discovery relating to Apple’s motion for a preliminary
23 injunction since July 18, 2011.

24 Subject to these objections, Samsung is willing to meet and confer with Apple about the
25 relevance and scope of the information sought by this request.

26 **REQUEST FOR PRODUCTION NO. 212:**

27 All physical samples of Apple products in your possession (excluding only samples, if any,
28 which may have been purchased exclusively for purposes related to this litigation by or at the

1 direction of counsel) together with all documents relating to when the samples were obtained, for
2 what purpose, and how you used them.

3 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 212:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the
10 Request as overbroad in that it seeks documents and things that pertain to products not at issue in
11 this litigation. Samsung further objects to the Request as overbroad in that it is not limited to any
12 reasonable time period and seeks documents and things from time periods not at issue in this
13 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
14 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
15 discovery of admissible evidence. For example, the request seeks every Apple product any person
16 who was at any time an employee of Samsung has ever owned, at any time. Samsung further
17 objects to the Request to the extent it seeks documents equally or more readily available to Apple
18 than to Samsung. Samsung further objects to the Request to the extent the requested documents
19 are publicly available. Samsung further objects to this request because Apple has delayed serving
20 this document request, despite Apple's earlier knowledge of the issues raised in the request and
21 despite the fact that Apple has known about the Court's Order governing discovery relating to
22 Apple's motion for a preliminary injunction since July 18, 2011.

23 Subject to these objections, Samsung is willing to meet and confer with Apple about the
24 relevance and scope of the information sought by this request.

25 **REQUEST FOR PRODUCTION NO. 213:**

26 All Documents relating to your inspection of Apple products. Documents responsive to
27 this Request include, but are not limited to, photographs of Apple products and tear-downs of
28

1 Apple products, notes and memoranda that you made relating to Apple products, and email
2 communications relating to any such inspection.

3 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 213:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the
10 Request as overbroad in that it seeks documents and things that pertain to products not at issue in
11 this litigation. Samsung further objects to this request as vague and ambiguous with respect to the
12 term “inspection.” Samsung further objects to the Request as overbroad in that it is not limited to
13 any reasonable time period and seeks documents and things from time periods not at issue in this
14 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
15 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
16 discovery of admissible evidence. Samsung further objects to this request because Apple has
17 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
18 the request and despite the fact that Apple has known about the Court’s Order governing discovery
19 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 214:**

23 All Documents relating to marketing of any Products at Issue that discuss or refer directly
24 or indirectly to Apple or Apple products, including copies of all advertisements or other
25 promotional materials, marketing plans, market surveys, focus group studies, or other documents
26 related to testing of advertisements or advertisement messaging. Documents responsive to this
27 Request include, but are not limited to, your “Hello” marketing campaign relating to the Galaxy S,
28

1 your “See Flash Run” marketing campaign for the Galaxy Tab, and your “Appelmos”
2 (“Applesauce”) marketing campaign relating to the Galaxy S II.

3 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 214:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects the request
10 as vague and ambiguous. For example, the term “indirectly” is vague and ambiguous. Samsung
11 further objects to the Request as overbroad in that it seeks documents and things that bear on
12 occurrences in other countries that are not at issue in this litigation. Samsung further objects to the
13 Request to the extent it seeks documents that are not within the possession, custody, or control of
14 Samsung. Samsung further objects to the Request to the extent it seeks documents containing
15 confidential third party information, including information subject to a non-disclosure or other
16 agreement between Samsung and a third party. Samsung further objects to this request because
17 Apple has delayed serving this document request, despite Apple’s earlier knowledge of the issues
18 raised in the request and despite the fact that Apple has known about the Court’s Order governing
19 discovery relating to Apple’s motion for a preliminary injunction since July 18, 2011.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 215:**

23 All Documents relating to any instances of consumer confusion in which Samsung was
24 made aware that a person confused an Apple product for a Product at Issue, or a Product at Issue
25 for an Apple product.

26 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 215:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
4 burdensome, and/or would require undue expense to answer. Samsung further objects the request
5 as vague and ambiguous. For example, the term “consumer confusion” is vague and ambiguous.
6 Samsung further objects to the Request as overbroad in that it seeks documents and things that
7 pertain to products not at issue in this litigation. Samsung further objects to this request because
8 Apple has delayed serving this document request, despite Apple’s earlier knowledge of the issues
9 raised in the request and despite the fact that Apple has known about the Court’s Order governing
10 discovery relating to Apple’s motion for a preliminary injunction since July 18, 2011.

11 Subject to these objections, Samsung is willing to meet and confer with Apple about the
12 relevance and scope of the information sought by this request.

13 **REQUEST FOR PRODUCTION NO. 216:**

14 All Documents relating to your decision to give away a free Galaxy Tab 10.1 with the
15 purchase of certain Samsung televisions at Best Buy stores.

16 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 216:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
21 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
22 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
24 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
25 discovery of admissible evidence. Samsung further objects to this request because Apple has
26 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
27 the request and despite the fact that Apple has known about the Court’s Order governing discovery
28 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 217:**

4 All Documents relating to any promotions, actual or considered, related to any of the
5 Products at Issue.

6 **OBJECTIONS TO REQUEST FOR PRODUCTION NO. 217:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
11 applicable privilege or immunity. Samsung further objects to this Request as overbroad in that it
12 seeks “all” documents and is not reasonably limited as to the scope of documents and things it
13 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
14 reasonable time period and seeks documents and things from time periods not at issue in this
15 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
16 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
17 discovery of admissible evidence. Samsung further objects to this request because Apple has
18 delayed serving this document request, despite Apple’s earlier knowledge of the issues raised in
19 the request and despite the fact that Apple has known about the Court’s Order governing discovery
20 relating to Apple’s motion for a preliminary injunction since July 18, 2011.

21 Subject to these objections, Samsung is willing to meet and confer with Apple about the
22 relevance and scope of the information sought by this request.

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DATED: August 31, 2011

Respectfully submitted,

QUINN EMANUEL URQUHART &
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