

EXHIBIT 3

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11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

15 APPLE INC., a California corporation,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., a
19 Korean corporation; SAMSUNG
20 ELECTRONICS AMERICA, INC., a New
21 York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

22 Defendants.

Case No. 11-cv-01846-LHK

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

1 APPLE INC. (“Apple”) hereby requests, pursuant to Rules 26 and 33 of the Federal Rules
2 of Civil Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS
3 AMERICA, INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC,
4 (“Defendants”) respond to Apple’s Interrogatories Relating to Apple’s Motion for a Preliminary
5 Injunction – Set Two. Apple requests that Defendants answer each interrogatory below and serve
6 their answers on Apple’s counsel at the offices of Morrison & Foerster, LLP, 425 Market St., San
7 Francisco, CA 94105-2482 on or before September 12, 2011.

8 DEFINITIONS

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

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

18 2. “Patents in Suit” means U.S. Patent No. 7,469,381, U.S. Design Patent No.
19 D504,889, U.S. Design Patent No. D593,087, and U.S. Design Patent No. D618,677,
20 collectively.

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

23 4. “Hardware Design” means a device’s casing, screen and screen borders, bezel or
24 band, buttons, ports, speaker, and speaker slots, and all hardware, insignia, or ornamentation
25 thereon.

26 5. “Identify” means (1) when referring to a person, the person’s full name, present or
27 last known address and telephone number, and the last known title and place of employment; (2)
28 when referring to nonpatent documents, the production number or type of document, its general

1 nature and subject matter, date of creation, and all author(s), addresses(s), and recipient(s); and
2 (3) when referring to patent documents, the country, patent and/or application number, dates of
3 filing, publications, and grant, and the names of patentees or applicants.

4 **INTERROGATORIES**

5 **INTERROGATORY NO. 10:**

6 Describe the circumstances surrounding the development and/or design of the Hardware
7 Design of the Products at Issue, including dates of conception of the design of the Hardware
8 Design, the persons who were involved, and the tools or software used to create or model the
9 design of the Hardware Design.

10 **INTERROGATORY NO. 11:**

11 Describe the circumstances surrounding the development and/or design of features in the
12 Products at Issue relating to: (1) the functionality that allows for a list to be scrolled beyond its
13 terminus or a document to be translated beyond its edge until the list or document is partially
14 displayed and (2) functionality that allows for a list that is scrolled beyond its terminus to scroll
15 back or bounce back into place or for a document that is translated beyond its edge to translate
16 back or bounce back so that the list or document returns to fill the screen, including dates of
17 conception of the design of the functionalities and the persons who were involved.

18 **INTERROGATORY NO. 12:**

19 Identify the date(s) on which Samsung first became aware of each of the Patents in Suit,
20 the persons at Samsung who first became aware of the aforementioned patents, and the
21 circumstances surrounding those individuals' awareness of the aforementioned patents.

22 **INTERROGATORY NO. 13:**

23 Identify and describe any surveys, focus groups, or market research relating to actual or
24 prospective smartphone or tablet computer customers.

25 **INTERROGATORY NO. 14:**

26 Describe any instances of consumer confusion in which Samsung was made aware that a
27 person confused an Apple product for a Product at Issue, or a Product at Issue for an Apple
28 product.

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Dated: August 26, 2011

MORRISON & FOERSTER LLP

By: /s/ Richard S.J. Hung
RICHARD S.J. HUNG
Attorneys for Defendant
APPLE INC.