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13 Attorneys for SAMSUNG ELECTRONICS CO.,  
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

26 Defendant.  
27  
28

CASE NO. 11-cv-01846-LHK

DECLARATION OF RUSSELL WILKINS

**PUBLIC REDACTED VERSION**

1 I, Russell Wilkins, do hereby declare as follows:

2 1. I am Senior Manager of Samsung's Voice of the Customer (VOC) Department at  
3 Samsung Telecommunications America, LLC ("STA"). I have been employed by STA since  
4 2003. I oversee all of the call centers that service Samsung's U.S. mobile products. I have  
5 personal knowledge of the matters set forth herein, and if called as a witness, I could and would  
6 testify competently as follows.

7 2. STA operates call centers which offer product support and receive feedback from  
8 customers regarding Samsung's products. [REDACTED]

9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]

16 3. I understand that in this litigation, Apple has asked Samsung to produce "any  
17 instances of consumer confusion in which Samsung was made aware that a person confused an  
18 Apple product for a Product at Issue, or a Product at Issue for an Apple product."

19 4. It would be very difficult and time-consuming to attempt to search for and locate  
20 documents responsive to this request. [REDACTED]

21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26 [REDACTED]

27 5. [REDACTED]  
28 [REDACTED]

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[REDACTED]

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[REDACTED]

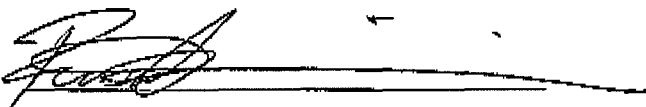
[REDACTED] For example, it is possible that Samsung customers may have contacted the call centers to comment on how they disliked their previous Apple product, but enjoy using their Samsung product. This would not be responsive to Apple's requests, because the consumer is not expressing any confusion as to the source of the product he or she was calling about.

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I declare under the penalty of perjury that the forgoing is true and correct to the best of my knowledge.

Executed this 26th day of September, 2011, at Colorado Springs, Colorado.



Russell Wilkins

1                               **GENERAL ORDER ATTESTATION**

2           I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the  
3 foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the  
4 electronic filing of this document has been obtained from Russell Wilkins.

5  
6   /s/ Victoria Maroulis

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