

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

13 Attorneys for Samsung Electronics Co., Ltd.,
 Samsung Electronics America, Inc. and Samsung
 14 Telecommunications America, LLC

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

17 APPLE INC., a California corporation,

18 Plaintiff,

19 vs.

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

24 Defendants.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF VICTORIA F.
 MAROULIS IN SUPPORT OF
 SAMSUNG'S CIVIL L.R. 3-12(b)
 MOTION TO CONSIDER WHETHER
 CASES SHOULD BE RELATED**

1 I, Victoria F. Maroulis, declare:

2 1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively "Samsung"). I have personal knowledge of the
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such
6 facts under oath.

7 2. On May 6, 2011, I e-mailed counsel for Apple, Inc. ("Apple") asking whether
8 Apple would join Samsung in filing a joint motion to consider related this case and Samsung
9 Electronics Co., Ltd. and Samsung Telecommunications America, LLC v. Apple, Inc. (Case No.
10 11-cv-02079-EDL) (N.D. Cal. April 27, 2011) (the "Samsung Action"). I attached to this email a
11 draft of such joint motion and a draft stipulation in support of the motion. I requested that counsel
12 for Apple let me know by Monday, May 9 whether Apple would join such a motion.

13 3. On May 10, 2011, counsel for Apple replied to my e-mail, indicating that Apple
14 would oppose a motion to consider related this case and the Samsung Action.

15 4. Attached hereto as Exhibit A is a true and correct copy of the complaint filed in the
16 Samsung Action.

17 5. Attached hereto as Exhibit B is a true and correct copy of Exhibit 1 to the
18 complaint filed in the Samsung Action.

19 6. Attached hereto as Exhibit C is a true and correct copy of Exhibit 2 to the
20 complaint filed in the Samsung Action.

21 7. Attached hereto as Exhibit D is a true and correct copy of Exhibit 3 to the
22 complaint filed in the Samsung Action.

23 8. Attached hereto as Exhibit E is a true and correct copy of Exhibit 4 to the
24 complaint filed in the Samsung Action.

25 9. Attached hereto as Exhibit F is a true and correct copy of Exhibit 5 to the complaint
26 filed in the Samsung Action.

27 10. Attached hereto as Exhibit G is a true and correct copy of Exhibit 6 to the
28 complaint filed in the Samsung Action.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

11. Attached hereto as Exhibit H is a true and correct copy of Exhibit 7 to the complaint filed in the Samsung Action.

12. Attached hereto as Exhibit I is a true and correct copy of Exhibit 8 to the complaint filed in the Samsung Action.

13. Attached hereto as Exhibit J is a true and correct copy of Exhibit 9 to the complaint filed in the Samsung Action.

14. Attached hereto as Exhibit K is a true and correct copy of Exhibit 10 to the complaint filed in the Samsung Action.

15. Attached hereto as Exhibit L is a true and correct copy of the e-mail I sent to counsel for Apple on May 6, 2011.

16. Attached hereto as Exhibit M is a true and correct of the May 10, 2011 e-mail that I received from counsel for Apple.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood Shores, California on May 11, 2011.

By /s/ Victoria F. Maroulis
Victoria F. Maroulis