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

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**SUPPLEMENTAL DECLARATION OF
 MICHAEL T. ZELLER IN SUPPORT OF
 MOTION TO EXCLUDE ORDINARY
 OBSERVER OPINIONS OF APPLE
 EXPERT COOPER WOODRING**

**Date: October 13, 2011
 Time: 1:30 pm
 Place: Courtroom 8, 4th Floor
 Judge: Hon. Lucy H. Koh**

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SUPPLEMENTAL DECLARATION OF MICHAEL T. ZELLER

I, Michael T. Zeller, do hereby declare and state as follows:

1. I am a member of the State Bars of California, New York and Illinois and am counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively "Samsung") in these proceedings. I have personal knowledge of the facts stated herein and, if sworn as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the Deposition Transcript of Cooper Woodring, dated August 5, 2011.

3. Attached hereto as Exhibit 2 is a true and correct copy of the design registration number 1241638, and a certified translation.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Deposition Transcript of Christopher Stringer, dated August 3, 2011.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 20, 2011, at Los Angeles, California.

/s/ Michael T. Zeller
Michael T. Zeller

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GENERAL ORDER ATTESTATION

I, Kevin Johnson, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Michael Zeller.

/s/ Kevin Johnson