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 9 Attorneys for Plaintiff and
 10 Counterclaim-Defendant APPLE INC.

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

14
 15 APPLE INC., a California corporation,
 16 Plaintiff,
 17 v.
 18 SAMSUNG ELECTRONICS CO., LTD., A
 Korean business entity; SAMSUNG
 19 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 20 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company.,
 21 Defendants.
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Case No. 11-cv-01846-LHK

**DECLARATION OF DEOK KEUN
 MATTHEW AHN IN SUPPORT OF
 APPLE'S OPENING CLAIM
 CONSTRUCTION BRIEF
 PURSUANT TO PATENT L.R. 4-5**

Claim Construction
 Hearing: Jan 20, 2012
 Time: 10:00 a.m.
 Place: Courtroom 4, 5th Floor
 Judge: Honorable Lucy H. Koh

1 I, Deok Keun Matthew Ahn, declare as follows:

2 1. I am an associate at the law firm of Morrison & Foerster LLP, attorneys of record
3 in this action for plaintiff Apple Inc. (“Apple”). I submit this declaration in support of Apple’s
4 Opening Claim Construction Brief Pursuant to Patent L.R. 4-5. Unless otherwise indicated, I
5 have personal knowledge of the matters set forth below. If called as a witness I could and would
6 testify competently as follows:

7 2. Attached hereto as Exhibit A to this Declaration is a true and correct copy of U.S.
8 Patent No. 6,493,002.

9 3. Attached hereto as Exhibit B to this Declaration is a true and correct copy of U.S.
10 Patent No. 7,469,381.

11 4. Attached hereto as Exhibit C to this Declaration is a true and correct copy of U.S.
12 Patent No. 7,663,607.

13 5. Attached hereto as Exhibit D to this Declaration is a true and correct copy of U.S.
14 Patent No. 7,812,828.

15 6. Attached hereto as Exhibit E to this Declaration is a true and correct copy of U.S.
16 Patent No. 7,844,915.

17 7. Attached hereto as Exhibit F to this Declaration is a true and correct copy of U.S.
18 Patent No. 7,853,891.

19 8. Attached hereto as Exhibit G to this Declaration is a true and correct copy of an
20 Amendment and Response to Office Action bearing Bates Numbers APLNDC00028053-28060,
21 excerpted from the produced file history of U.S. Patent No. 6,493,002.

22 9. Attached hereto as Exhibit H to this Declaration is a true and correct copy of a
23 Response to Final Office Action bearing Bates Numbers APLNDC00028082-28085, excerpted
24 from the produced file history of U.S. Patent No. 6,493,002.

25 10. Attached hereto as Exhibit I to this Declaration is a true and correct copy of an
26 excerpt from the transcript of the September 14, 2011 deposition of Andries van Dam.

27 11. Attached hereto as Exhibit J to this Declaration is a true and correct copy of an
28 excerpt from the transcript of the August 16, 2011 deposition of Ravin Balakrishnan.

1 12. Attached hereto as Exhibit K to this Declaration is a true and correct copy of an
2 excerpt from the Reply Declaration of Ravin Balakrishnan, Ph.D. in Support of Apple's Motion
3 for a Preliminary Injunction (Dkt. No. 278-0).

4 13. Attached hereto as Exhibit L to this Declaration is a true and correct copy of an
5 excerpt from the book E.R. Davies, Machine Vision: Theory, Algorithms, Practicalities (2d Ed.)
6 (Nov. 1996), produced in this action bearing Bates numbers SAMNDCA00031977-31979;
7 31991-32001.

8 14. Attached hereto as Exhibit M to this Declaration is a true and correct copy of U.S.
9 Patent No. 4,618,989, produced in this action bearing Bates numbers SAMNDCA00032782-
10 32804.

11 15. Attached hereto as Exhibit N to this Declaration is a true and correct copy of U.S.
12 Patent No. 5,734,751, produced in this action bearing Bates numbers SAMNDCA00032707-
13 32717.

14 16. Attached hereto as Exhibit O to this Declaration is a true and correct copy of an
15 excerpt from the transcript of the October 31, 2011 deposition of Wayne Westerman.

16 17. Attached hereto as Exhibit P to this Declaration is a true and correct copy of an
17 Interview Summary, Statement of Substance of Interview, Request for Corrected Office Action,
18 and Amendment in Response to Non-Final Office Action bearing Bates Numbers
19 APLNDC00021674-21692, excerpted from the produced file history of U.S. Patent No.
20 7,812,828.

21 18. Attached hereto as Exhibit Q to this Declaration is a true and correct copy of an
22 excerpt from the transcript of the October 14, 2011 deposition of Imran Chaudhri.

23 I declare under the penalty of perjury that the forgoing is true and correct. Executed this
24 8th day of December, 2011, at San Francisco, California.

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26
27 /s/ Deok Keun Matthew Ahn
28 Deok Keun Matthew Ahn

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Deok Keun Matthew Ahn has concurred in this filing.

Dated: December 8, 2011

/s/ Michael A. Jacobs
Michael A. Jacobs