

EXHIBIT 2

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

16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,
20

21 Plaintiff,

22 vs.

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

26 Defendant.
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF TODD M. BRIGGS
IN SUPPORT OF SAMSUNG'S
RESPONSE TO APPLE'S OPENING
CLAIM CONSTRUCTION BRIEF**

Date: January 20, 2012

Time: 10:00 am

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 I, Todd M. Briggs, declare as follows:

2 1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan LLP and
3 counsel for defendants and counter-claimants Samsung Electronics Co. Ltd., Samsung Electronics
4 America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung"). I
5 submit this declaration in support of Samsung's Response to Apple's Opening Claim Construction
6 Brief. I am personally familiar with and knowledgeable about the facts stated in this declaration
7 and if called upon could and would testify competently as to the statements made herein.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of U.S. Patent No.
9 6,493,002.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of certain excerpts from the
11 Deposition of Steven Christensen, dated October 26, 2011, and Exhibit 978 to the Deposition of
12 Steven Christensen.

13 4. Attached hereto as **Exhibit C** is a true and correct copy of certain excerpts from the
14 file history of U.S. Patent No. 6,493,002.

15 5. Attached hereto as **Exhibit D** is a true and correct copy of U.S. Patent No.
16 5,659,693.

17 6. Attached hereto as **Exhibit E** is a true and correct copy of U.S. Patent No.
18 7,469,381.

19 7. Attached hereto as **Exhibit F** is a true and correct copy of certain excerpts from the
20 Deposition of Ravin Balakrishnan, dated August 16, 2011.

21 8. Attached hereto as **Exhibit G** is a true and correct copy of Exhibit 104 to the
22 Deposition of Ravin Balakrishnan, dated August 16, 2011.

23 9. Attached hereto as **Exhibit H** is a true and correct copy of U.S. Patent No.
24 7,663,607.

25 10. Attached hereto as **Exhibit I** is a true and correct copy of certain excerpts from the
26 Deposition of Brian Q. Huppi, dated October 18, 2011.

27 11. Attached hereto as **Exhibit J** is a true and correct copy of certain excerpts from the
28 Deposition of Joshua Strickon, dated October 20, 2011.

- 1 12. Attached hereto as **Exhibit K** is a true and correct copy of U.S. Patent No.
2 7,812,828.
- 3 13. Attached hereto as **Exhibit L** is a true and correct copy of certain excerpts from the
4 file history of U.S. Patent No. 7,812,828.
- 5 14. Attached hereto as **Exhibit M** is a true and correct copy of certain excerpts from
6 the Deposition of Wayne Westerman, dated October 31, 2011.
- 7 15. Attached hereto as **Exhibit N** is a true and correct copy of certain excerpts from the
8 hearing transcript in the matter of *Certain Mobile Device and Related Software*, ITC Inv. No. 337-
9 TA-750, commencing September 23, 2011.
- 10 16. Attached hereto as **Exhibit O** is a true and correct copy of certain excerpts from the
11 Pre-Trial Statement and Brief of the Commission Investigative Staff in the matter of *Certain*
12 *Mobile Device and Related Software*, ITC Inv. No. 337-TA-750, dated September 9, 2011.
- 13 17. Attached hereto as **Exhibit P** is a true and correct copy of U.S. Patent No.
14 7,844,915.
- 15 18. Attached hereto as **Exhibit Q** is a true and correct copy of U.S. Patent No.
16 7,853,891.
- 17 19. Attached hereto as **Exhibit R** is a true and correct copy of certain excerpts from the
18 file history of U.S. Patent No. 7,853,891.
- 19 20. Attached hereto as **Exhibit S** is a true and correct copy of certain excerpts from the
20 Deposition of Imran Chaudhri, dated October 14, 2011.
- 21 21. Attached hereto as **Exhibit T** is a true and correct copy of screenshots from the
22 iPhone “Clock” program.
- 23 22. Attached hereto as **Exhibit U** is a true and correct copy of Apple’s Infringement
24 Chart for U.S. Patent No. 7,853,891 (Exhibit 8) for the Samsung Galaxy Prevail Mobile Phone.
- 25 23. Attached hereto as **Exhibit V** is a true and correct copy of Apple’s Infringement
26 Chart for U.S. Patent No. 7,853,891 (Exhibit 9) for the Samsung Galaxy Tab 10.1.
- 27 24. Attached hereto as **Exhibit W** is a true and correct copy of U.S. Pat. App. Pub. No.
28 2003/0016253.

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25. Attached hereto as **Exhibit X** is a true and correct copy of certain excerpts from the file history of U.S. Patent No. 7,853,891.

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

DATED: December 22, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Todd M. Briggs
Todd M. Briggs
Attorneys for Defendants/Counter-Claimants
SAMSUNG ELECTRONICS CO., LTD.,
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and SAMSUNG TELECOMMUNICATIONS
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