

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.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF TODD M. BRIGGS
IN SUPPORT OF SAMSUNG'S REPLY
CLAIM CONSTRUCTION BRIEF**

Date: January 20, 2012

Time: 10:00 am

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

**[PROPOSED] PUBLIC REDACTED
VERSION**

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 Reply Claim Construction Brief. I am personally
6 familiar with and knowledgeable about the facts stated in this declaration and if called upon could
7 and would testify competently as to the statements made herein.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of certain excerpts from the
9 Deposition of Tony Givargis, Ph.D., including lines 81:8-13.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of certain excerpts from the
11 Deposition of Tony Givargis, Ph.D., including lines 36:15-23 and 39:17-40:1.

12 4. Attached hereto as **Exhibit C** is a true and correct copy certain excerpts from the
13 Deposition of Tony Givargis, Ph.D., including lines 35:25-36:4.

14 5. Attached hereto as **Exhibit D** is a true and correct copy of certain excerpts from the
15 Deposition of Tony Givargis, Ph.D., including lines 40:13-23 and 41:17-19.

16 6. Attached hereto as **Exhibit E** is a true and correct copy of certain excerpts from the
17 Deposition of Tony Givargis, Ph.D., including lines 41:25-42:8.

18 7. Attached hereto as **Exhibit F** is a true and correct copy of certain excerpts from the
19 Deposition of Tony Givargis, Ph.D., including lines 40:6-9.

20 8. Attached hereto as **Exhibit G** is a true and correct copy of certain excerpts from the
21 Deposition of Tony Givargis, Ph.D., including lines 70:24-71:6 and 73:1-11.

22 9. Attached hereto as **Exhibit H** is a true and correct copy of certain excerpts from the
23 Deposition of Tony Givargis, Ph.D., including lines 53:10-11 and 94:3-4.

24 10. Attached hereto as **Exhibit I** is a true and correct copy of certain excerpts from the
25 Deposition of Tony Givargis, Ph.D., including lines 86:12-25 and 87:21-88:2.

26 11. Attached hereto as **Exhibit J** is a true and correct copy of certain excerpts from the
27 Deposition of Tony Givargis, Ph.D., including lines 86:4-17.

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

DATED: December 29, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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

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LTD., SAMSUNG ELECTRONICS AMERICA,
14 INC. and SAMSUNG
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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

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

25 Defendant.
26

CASE NO. 11-cv-01846-LHK

**MANUAL FILING NOTIFICATION FOR
EXHIBITS A-J TO DECLARATION OF
TODD M. BRIGGS IN SUPPORT OF
SAMSUNG'S REPLY CLAIM
CONSTRUCTION BRIEF**

1 **MANUAL FILING NOTIFICATION**

2
3 Regarding: EXHIBIT A-J TO THE DECLARATION OF TODD M. BRIGGS IN SUPPORT
4 OF SAMSUNG'S REPLY CLAIM CONSTRUCTION BRIEF

5
6 This filing is in paper or physical form only, and is being maintained in the case file in the Clerk's
7 office. If you are a participant on this case, this filing will be served in hard-copy shortly.

8 For information on retrieving this filing directly from the court, please see the court's main web
9 site at <http://www.cand.uscourts.gov> under Frequently Asked Questions (FAQ).

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16 X Item Under Seal

17 _____ Conformance with the Judicial Conference Privacy Policy (General Order 53)

18 _____ Other (description): _____

19
20 DATED: December 29, 2011

Respectfully submitted,

21 QUINN EMANUEL URQUHART &
22 SULLIVAN, LLP

23
24 By /s/ Victoria F. Maroulis
25 Victoria F. Maroulis
26 Attorneys for SAMSUNG ELECTRONICS CO.,
27 LTD., SAMSUNG ELECTRONICS AMERICA,
28 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC