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

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19
20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

26 Defendant.
27

CASE NO. 11-cv-01846-LHK

**DECLARATION OF ALEX BAXTER IN
SUPPORT OF DEFENDANT SAMSUNG'S
REPLY MEMORANDUM**

Date: April 5, 2012

Time: 1:30 p.m.

Place: Courtroom 4, 5th Floor

Judge: Hon. Lucy H. Koh

1 I, Alex Baxter, declare:

2 1. I am an associate 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. Attached hereto as **Exhibit 1** is a true and correct copy of an IPR Information
8 Statement and Licensing Declaration, issued by Samsung to the European Telecommunications
9 Standards Institute (“ETSI”) and dated September 19, 2003. This copy of this statement was
10 produced by Apple with Bates Numbers APLNDC-WH-A 0000009375-9396.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of an IPR Information
12 Statement and Licensing Declaration, issued by Samsung to ETSI and dated May 16, 2006. This
13 copy of this statement was produced by Apple with Bates Numbers APLNDC-WH-A
14 0000009415-9431.

15 4. Attached hereto as **Exhibit 3** is a true and correct copy of an IPR Information
16 Statement and Licensing Declaration, issued by Samsung to ETSI and dated July 8, 2007. This
17 copy of this statement was produced by Apple with Bates Numbers APLNDC-WH-A
18 0000009442-9446.

19 5. Attached hereto as **Exhibit 4** is a true and correct copy of an IPR Information
20 Statement and Licensing Declaration, issued by Samsung to ETSI and dated July 24, 2008. This
21 copy of this statement was produced by Apple with Bates Numbers APLNDC-WH-A
22 0000009482-9486.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed in
24 Redwood Shores, California on January 9, 2012.

25

26

27

/s/ Alex Baxter

28

Alex Baxter

