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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 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 18

19 APPLE INC., a California corporation,
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Plaintiff,
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vs.
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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,

Defendant.
 26

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

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