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11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 APPLE INC.,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., A
 Korean business entity; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 22 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company.,
 23 Defendants.
 24

Case No. 11-cv-01846-LHK (PSG)
**DECLARATION OF MIA MAZZA
 IN SUPPORT OF MOTION FOR
 PROTECTIVE ORDER
 REGARDING SAMSUNG'S FIRST
 30(b)(6) DEPOSITION NOTICE**

1 I, Mia Mazza, declare as follows:

2 1. I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.
3 (“Apple”). I am licensed to practice law in the State of California. Unless otherwise indicated, I
4 have personal knowledge of the matters stated herein and, if called as a witness, could and would
5 testify competently thereto. I make this declaration in support of Apple’s Motion for Protective
6 Order Regarding Samsung’s First Rule 30(b)(6) Deposition Notice.

7 2. Attached hereto as Exhibit A is a true and correct copy of Samsung’s First Rule
8 30(b)(6) Notice to Apple Inc., served on December 14, 2011.

9 3. Attached hereto as Exhibit B is a true and correct copy of correspondence dated
10 December 27, 2011, from counsel for Apple to counsel for Samsung.

11 4. Attached hereto as Exhibit C is a true and correct copy of correspondence dated
12 December 31, 2011, from counsel for Samsung to counsel for Apple.

13 5. Attached hereto as Exhibit D is a true and correct copy of correspondence dated
14 January 3, 2012.

15 6. On September 16, 2011, Samsung propounded its Second Set of Interrogatories to
16 Apple Inc., containing Interrogatory Nos. 19–32. Interrogatory No. 19 reads as follows:

17 “Separately for each APPLE ACCUSED PRODUCT, IDENTIFY: (1) Separately for each
18 APPLE ACCUSED PRODUCT, IDENTIFY: (1) the Baseband Processor used; (2) the
19 Executable Software incorporated or installed in the APPLE ACCUSED PRODUCT; (2) the 3
20 GPP Release(s) supported (including which versions and subversions of the 3GPP specification
21 are supported within each Release); (3) the version(s) of HSUPA supported; and (4) the
22 version(s) of HSDPA supported, and IDENTIFY any documents which reflect these categories of
23 information. Interrogatory No. 20 reads as follows: Separately for each APPLE ACCUSED
24 PRODUCT and each Baseband Processor, IDENTIFY the Software or portions of Software
25 (including corresponding file name and line numbers) for performing multiplexing, channel
26 coding, interleaving, demultiplexing of radio frames, generating scrambling codes and/or rate
27 matching, or state which of these functions are not performed by the APPLE ACCUSED
28

1 PRODUCT or Baseband Processor. Apple responded to both of these Interrogatories on
2 October 26, 2011.

3 7. I have asked my litigation team to review the transcripts of depositions taken by
4 Samsung in this case to determine the number of hours of deposition time Samsung has used up
5 in post-Preliminary Injunction, party depositions. My team calculated that Samsung has used up
6 105 hours of its allotted 250 hours, leaving less than 145 hours for their remaining depositions.

7 I declare under penalty of perjury that the foregoing is true and correct. Executed this
8 10th day of January, 2012 at San Francisco, California.

9 /s/ Mia Mazza
10 Mia Mazza

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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 Mia Mazza has concurred in this filing.

Dated: January 10, 2012

/s/ Michael A. Jacobs
Michael A. Jacobs