

Exhibit B

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LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

23 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

24 TELECOMMUNICATIONS AMERICA,

LLC, a Delaware limited liability company,

25 Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S OBJECTIONS AND
RESPONSES TO APPLE, INC.'S THIRD
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS AND THINGS (NOS.
53-155)**

1 **OBJECTIONS COMMON TO ALL REQUESTS FOR PRODUCTION**

2 The following objections apply to each document request in Apple Inc.'s ("Apple's")
3 Third Set of Requests for Production of Documents and Things, whether or not stated separately
4 in response to each particular document request.

5 1. Samsung objects to each document request to the extent that it requests documents
6 and information protected from disclosure by the attorney-client privilege, attorney work product
7 doctrine, community of interest doctrine, joint defense privilege, and/or any other applicable
8 privilege. Any such documents and information will not be provided, and an inadvertent
9 production of any document or information that Samsung believes is immune from discovery
10 pursuant to any applicable privilege shall not be deemed a waiver. Samsung may give written
11 notice to Apple that the document or information inadvertently produced is privileged or otherwise
12 protected, and upon receipt of such written notice, Apple shall immediately comply with Federal
13 Rule of Civil Procedure 26(b)(5)(B) and the applicable provisions of any Protective Order entered
14 in this action, including the Model Interim Protective Order.

15 2. Samsung objects to each document request to the extent that it is vague,
16 ambiguous, overly broad, oppressive, unduly burdensome, harassing, compound, fails to identify
17 the documents and things sought with reasonable particularity, and seeks information that is
18 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Where
19 a term is vague and ambiguous, Samsung will respond based on its understanding of the term.

20 3. Samsung objects to each document request to the extent that it is not reasonably
21 limited in time or geographic scope, and to the extent it pertains to products that are not at issue in
22 this litigation.

23 4. Samsung objects to each document request to the extent that it seeks documents
24 that are not within its possession, custody or control. In making objections and/or responding to
25 any and all requests, Samsung does not indicate that responsive documents exist within the
26 ownership, possession, custody or control of Samsung.

27 5. Samsung objects to the definition of "Samsung," "You," "Your," and
28 "Defendants" as overly broad, unduly burdensome, vague, and as calling for documents or

1 information not in Samsung's possession, custody, or control to the extent that it defines Samsung
2 to include "all predecessors, successors, predecessors-in-interest, successors-in-interest,
3 subsidiaries, divisions, parents, and/or affiliates, past or present, any companies that have a
4 controlling interest in Defendants, and any current or former employee, officer, director, principal,
5 agent, consultant, representative, or attorney thereof, or anyone acting on their behalf."

6 6. Samsung objects to the definition of "Apple" as overly broad.

7 7. Samsung objects to the definition of "Qualcomm" as overly broad.

8 8. Samsung objects to the definition of "Intel" as overly broad.

9 9. Samsung objects to the definition of "Defined Wireless Standards" as overly broad
10 and overly burdensome to the extent it asks Samsung to provide information relating to standards
11 and/or wireless standards to which the Samsung Patents-in-Suit have not been declared as
12 Essential or relating to standards and/or wireless standards upon which Samsung does not rely in
13 its infringement contentions.

14 10. Samsung objects to the use of the defined terms "IPR Essential to any Defined
15 Wireless Standards" as overly broad and overly burdensome, to the extent it asks Samsung to
16 provide information not relating to the Samsung Patents-in-Suit or not relating to the Defined
17 Wireless Standards to which the Samsung Patents-in-Suit have been declared or are deemed
18 Essential.

19 11. Samsung objects to the definition of "Samsung's Alleged Essential Technology" as
20 overly broad, and to the extent it seeks information protected from disclosure by the attorney-
21 client privilege, attorney work product doctrine, community of interest doctrine, joint defense
22 privilege, and/or any other applicable privilege.

23 12. Samsung objects to the definition of "Third Party" or "Third Parties" as overly
24 broad.

25 13. Samsung objects to the definition of "Relating" as overly broad.

26 14. Samsung objects to Instruction Nos. 1 and 3 to the extent they ask for documents to
27 be produced "without abbreviation or redaction" or "in full." Where applicable, Samsung will
28 redact from certain documents non-responsive, irrelevant or privileged information.

1 15. Samsung objects to Instruction No. 2 to the extent it asks Samsung to log any
2 privileged document dated after April 15, 2011.

3 16. Samsung further objects to each document request to the extent it seeks highly
4 confidential documents containing Samsung's sensitive proprietary business information, the
5 disclosure of which could cause Samsung substantial competitive harm. Any such documents will
6 be appropriately designated under the applicable protective order and/or redacted to exclude non-
7 responsive, irrelevant or privileged information.

8 17. Samsung objects to each document request to the extent it seeks documents more
9 readily available to Apple than to Samsung, or equally available to Apple as to Samsung,
10 including documents and things that are publicly available.

11 18. Samsung objects to each document request to the extent that it seeks the
12 confidential, proprietary and/or trade secret information of third parties, and to the extent it seeks
13 information subject to non-disclosure or other confidentiality agreements between Samsung and a
14 third party.

15 19. Samsung objects to each document request to the extent that it seeks documents
16 protected from disclosure by the constitutional and/or statutory privacy rights of third persons.

17 20. Samsung objects to each document request that alleges or implies Samsung
18 engaged in copying or other illegal activity as inappropriate harassment.

19 21. Samsung objects to each document request to the extent that it seeks documents
20 and things before Samsung is required to disclose such documents and things in accordance with
21 any applicable law, such as the Northern District of California Patent Local Rules.

22 22. Samsung objects to each document request to the extent that it seeks a legal
23 conclusion.

24 23. Samsung objects to each document request to the extent that it seeks to impose any
25 requirement or discovery obligation greater or different than those imposed by the Federal Rules
26 of Civil Procedure.

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1 24. Samsung's investigation and analysis of the facts and law pertaining to this lawsuit
2 is ongoing. Thus, Samsung's responses are made without prejudice to its right to subsequently
3 add, modify or otherwise change, correct, or amend these responses.

4 **REQUESTS FOR PRODUCTION**

5 **REQUEST FOR PRODUCTION NO. 53:**

6 All non-identical complete certified copies of prosecution histories of each of the Samsung
7 Patents-In-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it
11 seeks documents equally or more readily available to Apple than to Samsung. Samsung further
12 objects to the Request to the extent the requested documents are publicly available. Samsung
13 further objects to the Request as premature to the extent it seeks documents and things inconsistent
14 with the timeframes set forth in the Northern District of California Patent Local Rules.

15 Subject to these objections, Samsung will produce relevant, non-privileged documents
16 within its possession, custody, or control, if any, after conducting a reasonable search in
17 accordance with the Patent Local Rules.

18 **REQUEST FOR PRODUCTION NO. 54:**

19 All foreign counterparts to the Samsung Patents-in-Suit.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
23 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
24 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
25 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
26 burdensome, and/or would require undue expense to answer. Samsung further objects to the
27 Request to the extent it seeks documents equally or more readily available to Apple than to
28

1 Samsung. Samsung further objects to the Request to the extent the requested documents are
2 publicly available.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 55:**

7 The file history for each foreign counterpart to the Samsung Patents-in-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it
11 seeks documents equally or more readily available to Apple than to Samsung. Samsung further
12 objects to the Request to the extent the requested documents are publicly available.

13 Subject to these objections, Samsung will produce relevant, non-privileged documents
14 within its possession, custody, or control, if any, after conducting a reasonable search in
15 accordance with the Patent Local Rules.

16 **REQUEST FOR PRODUCTION NO. 56:**

17 All patents or patent applications to which the Samsung Patents-in-Suit claim priority.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung further objects to the Request as overbroad in
21 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further
22 objects to the Request to the extent it seeks documents equally or more readily available to Apple
23 than to Samsung. Samsung further objects to the Request to the extent the requested documents
24 are publicly available. Samsung further objects to the Request to the extent it calls for a legal
25 conclusion.

26 Subject to these objections, Samsung will produce relevant, non-privileged documents
27 within its possession, custody, or control, if any, after conducting a reasonable search in
28 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 57:**

2 All file histories of all patents or patent applications to which the Samsung Patents-in-Suit
3 claim priority.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung further objects to the Request as overbroad in
7 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further
8 objects to the Request to the extent it seeks documents that are not relevant to the claims or
9 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
10 evidence. Samsung further objects to the Request to the extent it seeks documents equally or more
11 readily available to Apple than to Samsung. Samsung further objects to the Request to the extent
12 the requested documents are publicly available. Samsung further objects to the Request to the
13 extent it calls for a legal conclusion.

14 Subject to these objections, Samsung will produce relevant, non-privileged documents
15 within its possession, custody, or control, if any, after conducting a reasonable search in
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 58:**

18 All reference and prior art cited during the prosecution of all patents or patent applications
19 to which the Samsung Patents-in-Suit claim priority.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it
23 seeks documents equally or more readily available to Apple than to Samsung. Samsung further
24 objects to the Request to the extent the requested documents are publicly available.

25 Subject to these objections, Samsung will produce relevant, non-privileged documents
26 within its possession, custody, or control, if any, after conducting a reasonable search in
27 accordance with the Patent Local Rules.

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1 **REQUEST FOR PRODUCTION NO. 59:**

2 All licenses to the Samsung Patents-in-Suit or any foreign counterparts thereto, including
3 without limitation any such licenses held by Qualcomm or Intel.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
10 burdensome, and/or would require undue expense to answer. Samsung further objects to the
11 Request to the extent it seeks documents containing confidential third party information, including
12 information subject to a non-disclosure or other agreement between Samsung and a third party.
13 Samsung further objects to the Request to the extent it seeks documents subject to a protective
14 order.

15 Subject to these objections, Samsung will produce relevant, non-privileged documents
16 within its possession, custody, or control, if any, after conducting a reasonable search in
17 accordance with the Patent Local Rules.

18 **REQUEST FOR PRODUCTION NO. 60:**

19 All documents sufficient to identify and describe Samsung's past and present procedures
20 and policies relating to document retention or document destruction, including without limitation
21 documents constituting any Samsung policies, formal or informal, relating to document retention
22 or document destruction.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly

1 burdensome, and/or would require undue expense to answer. Samsung further objects to the
2 Request to the extent it seeks documents that are not relevant to the claims or defenses of any
3 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
4 further objects to the Request as duplicative of Apple's Request For Production No. 50.

5 Subject to these objections, Samsung will produce relevant, non-privileged documents
6 within its possession, custody, or control, if any, after conducting a reasonable search in
7 accordance with the Patent Local Rules.

8 **REQUEST FOR PRODUCTION NO. 61:**

9 All documents considered or relied upon in the preparation of any document filed by
10 Samsung in this Litigation, including without limitation Samsung's Answer.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
18 as vague and ambiguous. For example, the term "considered or relied upon" is vague and
19 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably
20 limited as to the scope of documents and things it seeks. Samsung further objects to the Request
21 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
24 requested documents are publicly available.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the
26 relevance and scope of the information sought by this request.
27
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1 **REQUEST FOR PRODUCTION NO. 62:**

2 All documents that Samsung intends to rely upon to support any claim made in this
3 Litigation, including without limitation the claims, allegations, and statements made in Samsung's
4 Answer.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the
12 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
13 and things from time periods not at issue in this litigation. Samsung further objects to the Request
14 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.
15 Samsung further objects to the Request as premature to the extent it seeks documents and things
16 pertaining to the future course of this litigation.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 63:**

20 All organizational charts and other documents sufficient to show the reporting
21 relationships of the Samsung Named Inventors.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung further objects the Request as vague and
25 ambiguous. For example, the term "reporting relationships" is vague and ambiguous. Samsung
26 further objects to the Request to the extent it seeks documents that are not relevant to the claims or
27 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
28 evidence.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 64:**

4 All documents relating to the conception of the subject matter of each claim of the
5 Samsung Patents-In-Suit, including without limitation any engineering notebooks, laboratory
6 notebooks, memoranda, design reviews, progress reports, technical reports, drawings, schematics,
7 specifications, diagrams, data sheets, electronically stored information, diaries, calendars, test
8 results, invention disclosures, patent prosecution records, or any other documents that Samsung
9 contends corroborate the conception of any claim of any of the Samsung Patents-in-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request to the extent it seeks documents that are not within the possession, custody, or control of
18 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
19 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
20 extent the requested documents are publicly available. Samsung further objects to the Request as
21 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
22 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
23 the extent it calls for a legal conclusion.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents
25 within its possession, custody, or control, if any, after conducting a reasonable search in
26 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 65:**

2 All documents relating to any purported reduction to practice of the subject matter of each
3 claim of the Samsung Patents-In-Suit, including without limitation any engineering notebooks,
4 laboratory notebooks, memoranda, design reviews, progress reports, technical reports, drawings,
5 schematics, specifications, diagrams, data sheets, electronically stored information, diaries,
6 calendars, test results, invention disclosures, patent prosecution records, or any other documents
7 that Samsung contends corroborate the reduction to practice of any claim of any of the Samsung
8 Patents-in-Suit.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the
16 Request to the extent it seeks documents that are not within the possession, custody, or control of
17 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
18 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
19 extent the requested documents are publicly available. Samsung further objects to the Request as
20 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
21 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
22 the extent it calls for a legal conclusion.

23 Subject to these objections, Samsung will produce relevant, non-privileged documents
24 within its possession, custody, or control, if any, after conducting a reasonable search in
25 accordance with the Patent Local Rules.

26 **REQUEST FOR PRODUCTION NO. 66:**

27 All documents relating to any purported act of diligence leading to the reduction to practice
28 of the subject matter of each claim of the Samsung Patents-In-Suit, including without limitation

1 any engineering notebooks, laboratory notebooks, memoranda, design reviews, progress reports,
2 technical reports, drawings, data sheets, schematics, specifications, diagrams, electronically stored
3 information, diaries, calendars, test results, invention disclosures, patent prosecution records, or
4 any other documents that Samsung contends corroborate any act of diligence leading to the
5 reduction to practice of any claim of any of the Samsung Patents-in-Suit.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
11 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
12 burdensome, and/or would require undue expense to answer. Samsung further objects to the
13 Request to the extent it seeks documents that are not within the possession, custody, or control of
14 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
15 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
16 extent the requested documents are publicly available. Samsung further objects to the Request as
17 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
18 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
19 the extent it calls for a legal conclusion.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents
21 within its possession, custody, or control, if any, after conducting a reasonable search in
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 67:**

24 All documents relating to the research, design, development, manufacture, assembly,
25 testing, or operation of any Product that allegedly embodies, falls within the scope of, is, or the use
26 of which is or will be, covered by any claim of the Samsung Patents-In-Suit, including without
27 limitation any engineering notebooks, laboratory notebooks, memoranda, design reviews, progress
28

1 reports, technical reports, drawings, schematics, specifications, diagrams, electronically stored
2 information, diaries, calendars, or test results.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
10 as vague and ambiguous. For example, the term “research, design, development, manufacture,
11 assembly, testing, or operation” is vague and ambiguous. Samsung further objects to the Request
12 as overbroad in that it is not reasonably limited as to the scope of documents and things it seeks.
13 Samsung further objects to the Request to the extent it seeks documents that are not within the
14 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent
15 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further
16 objects to the Request to the extent the requested documents are publicly available. Samsung
17 further objects to the Request as premature to the extent it seeks documents and things inconsistent
18 with the timeframes set forth in the Northern District of California Patent Local Rules.

19 Subject to these objections, Samsung is willing to meet and confer with Apple about the
20 relevance and scope of the information sought by this request.

21 **REQUEST FOR PRODUCTION NO. 68:**

22 For each of the Samsung Patents-In-Suit, documents sufficient to identify all persons
23 involved in Samsung’s development of the subject matter of such patent at any time prior to the
24 filing of the application(s) that resulted in such patent.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 68:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
3 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
4 as vague and ambiguous. For example, the term “development of the subject matter” is vague and
5 ambiguous. Samsung further objects to the Request as overbroad in that it is not limited to any
6 reasonable time period and seeks documents and things from time periods not at issue in this
7 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
8 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
9 the extent it seeks documents equally or more readily available to Apple than to Samsung.
10 Samsung further objects to the Request to the extent the requested documents are publicly
11 available. Samsung further objects to the Request as premature to the extent it seeks documents
12 and things inconsistent with the timeframes set forth in the Northern District of California Patent
13 Local Rules.

14 Subject to these objections, Samsung will produce relevant, non-privileged documents
15 within its possession, custody, or control, if any, after conducting a reasonable search in
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 69:**

18 All engineering notebooks, laboratory notebooks, records, logs, files, and electronically
19 stored information generated at or by the direction of any of the Samsung Named Inventors, and
20 all engineering notebooks, laboratory notebooks, records, logs, files, and electronically stored
21 information in which any of the Samsung Named Inventors made any entries that pertain in any
22 way to any of the Samsung Patents-In-Suit or the subject matter disclosed or claimed therein.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly

1 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
2 as vague and ambiguous. For example, the terms “generated at or by the direction of” and
3 “subject matter” is vague and ambiguous. Samsung further objects to the Request as overbroad in
4 that it is not limited to any reasonable time period and seeks documents and things from time
5 periods not at issue in this litigation. Samsung further objects to the Request as duplicative of
6 Apple’s Request For Production Nos. 64, 65, 66. Samsung further objects to the Request to the
7 extent it seeks documents that are not within the possession, custody, or control of Samsung.
8 Samsung further objects to the Request to the extent it seeks documents equally or more readily
9 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
10 requested documents are publicly available. Samsung further objects to the Request as premature
11 to the extent it seeks documents and things inconsistent with the timeframes set forth in the
12 Northern District of California Patent Local Rules.

13 Subject to these objections, Samsung will produce relevant, non-privileged documents
14 within its possession, custody, or control, if any, after conducting a reasonable search in
15 accordance with the Patent Local Rules.

16 **REQUEST FOR PRODUCTION NO. 70:**

17 All documents relating to the inventorship of any claim of the Samsung Patents-In-Suit.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
24 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
25 as vague and ambiguous. For example, the term “inventorship” is vague and ambiguous.
26 Samsung further objects to the Request as duplicative of Apple’s Request For Production Nos. 64,
27 65, 66, and 69. Samsung further objects to the Request to the extent it seeks documents that are
28 not within the possession, custody, or control of Samsung. Samsung further objects to the Request

1 to the extent it seeks documents equally or more readily available to Apple than to Samsung.
2 Samsung further objects to the Request to the extent the requested documents are publicly
3 available. Samsung further objects to the Request as premature to the extent it seeks documents
4 and things inconsistent with the timeframes set forth in the Northern District of California Patent
5 Local Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents
7 within its possession, custody, or control, if any, after conducting a reasonable search in
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 71:**

10 All documents relating to the identification or determination of the inventors for each of
11 the Samsung Patents-In-Suit.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 71:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
17 applicable privilege or immunity. Samsung further objects the Request as vague and ambiguous.
18 For example, the terms “identification” or “determination” are vague and ambiguous. Samsung
19 further objects to the Request to the extent it is unduly burdensome, and/or would require undue
20 expense to answer. Samsung further objects to the Request to the extent it seeks documents
21 equally or more readily available to Apple than to Samsung. Samsung further objects to the
22 Request to the extent the requested documents are publicly available. Samsung further objects to
23 the Request to the extent it calls for a legal conclusion.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents
25 within its possession, custody, or control, if any, after conducting a reasonable search in
26 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 72:**

2 All documents relating to the contribution of each of the Samsung Named Inventors to the
3 Samsung Patents-In-Suit.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 72:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
10 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
11 as vague and ambiguous. For example, the term “contribution” is vague and ambiguous.
12 Samsung further objects to the Request as duplicative of Apple’s Request For Production Nos. 64,
13 65, 66, 69, 70, and 71. Samsung further objects to the Request to the extent it seeks documents
14 that are not within the possession, custody, or control of Samsung. Samsung further objects to the
15 Request to the extent it seeks documents equally or more readily available to Apple than to
16 Samsung. Samsung further objects to the Request to the extent the requested documents are
17 publicly available. Samsung further objects to the Request to the extent it calls for a legal
18 conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search in
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 73:**

23 All documents sent to or from any of the Samsung Named Inventors relating to the
24 Samsung Patents-In-Suit, the prosecution of the Samsung Patents-In-Suit, and/or the subject
25 matter of any claim of the Samsung Patents-In-Suit.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 73:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the
5 Request as duplicative of Apple's Request For Production Nos. 64, 65, 66, 69, 70, 71, and 72.
6 Samsung further objects to the Request to the extent it seeks documents that are not within the
7 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent
8 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further
9 objects to the Request to the extent the requested documents are publicly available. Samsung
10 further objects to the Request as premature to the extent it seeks documents and things inconsistent
11 with the timeframes set forth in the Northern District of California Patent Local Rules.

12 Subject to these objections, Samsung is willing to meet and confer with Apple about the
13 relevance and scope of the information sought by this request.

14 **REQUEST FOR PRODUCTION NO. 74:**

15 All documents relating to any affidavit or declaration ever signed, served, or filed in any
16 proceeding by any Named Inventors or prosecutors of the Samsung Patents-In-Suit at any time,
17 where any part of the affidavit or declaration relates to the Samsung Patents-In-Suit.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
24 burdensome, and/or would require undue expense to answer. Samsung further objects to the
25 Request to the extent it seeks documents that are not within the possession, custody, or control of
26 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
27 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
28

1 extent the requested documents are publicly available. Samsung further objects to the Request to
2 the extent it seeks documents subject to a protective order or under seal.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 75:**

6 All documents relating to the retention and/or participation of any Named Inventor as a
7 consultant, expert, or witness in any proceeding concerning the Samsung Patents-In-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request to the extent it seeks documents that are not within the possession, custody, or control of
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
17 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
18 extent the requested documents are publicly available. Samsung further objects to the Request to
19 the extent it seeks documents subject to a protective order or under seal.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 76:**

23 All documents constituting or relating to any Samsung guidelines, policies, protocols, or
24 practices for inventor or employee innovation or invention compensation.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the
4 Request as overbroad in that it seeks documents and things that pertain to products not at issue in
5 this litigation. Samsung further objects to the Request as overbroad in that it is not limited to any
6 reasonable time period and seeks documents and things from time periods not at issue in this
7 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
8 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
9 discovery of admissible evidence.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 77:**

13 All documents relating to any payment or other form of compensation or remuneration
14 made by Samsung or anyone acting on its behalf to any Named Inventor in connection with each
15 of the Samsung Patents-in-Suit, including without limitation documents sufficient to identify the
16 form of such payment, the amount of such payment, the date such payment was made, the identity
17 of each person with knowledge of such payment, and the reason for such payment.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
24 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
25 as vague and ambiguous. For example, the term “in connection with” is vague and ambiguous.
26 Samsung further objects to the Request as overbroad in that it is not reasonably limited as to the
27 scope of documents and things it seeks. Samsung further objects to the Request to the extent it
28

1 seeks documents that are not relevant to the claims or defenses of any party and/or not reasonably
2 calculated to lead to the discovery of admissible evidence.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 78:**

6 All documents relating to any payment or other form of compensation or remuneration
7 made by Samsung or anyone acting on its behalf to any Named Inventor in connection with his or
8 her involvement in this Litigation, including without limitation documents sufficient to identify
9 the form of such payment, the amount of such payment, the date such payment was made, the
10 identity of each person with knowledge of such payment, and the reason for such payment.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 78:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the
18 Request to the extent it seeks documents that are not relevant to the claims or defenses of any
19 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
20 further objects to the Request as duplicative of Apple's Request For Production No. 77.

21 Subject to these objections, Samsung is willing to meet and confer with Apple about the
22 relevance and scope of the information sought by this request.

23 **REQUEST FOR PRODUCTION NO. 79:**

24 All documents, whether published or not, constituting or relating to writings, publications,
25 abstracts, papers, presentations, memoranda, reports, or speeches authored or given by or for
26 Samsung or any of the Named Inventors relating to the subject matter disclosed or claimed in any
27 of the Samsung Patents-In-Suit, including without limitation such documents provided to SSOs.
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 79:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
8 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.
9 Samsung further objects to the Request as overbroad in that it is not limited to any reasonable time
10 period and seeks documents and things from time periods not at issue in this litigation. Samsung
11 further objects to the Request to the extent it seeks documents equally or more readily available to
12 Apple than to Samsung. Samsung further objects to the Request to the extent the requested
13 documents are publicly available. Samsung further objects to the Request as premature to the
14 extent it seeks documents and things inconsistent with the timeframes set forth in the Northern
15 District of California Patent Local Rules.

16 Subject to these objections, Samsung is willing to meet and confer with Apple about the
17 relevance and scope of the information sought by this request.

18 **REQUEST FOR PRODUCTION NO. 80:**

19 All documents, whether published or not, constituting or relating to publications, abstracts,
20 papers, presentations, or speeches authored relating to the subject matter disclosed or claimed in
21 any of the Samsung Patents-In-Suit, including without limitation such documents provided to
22 SSOs.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly

1 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
2 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.
3 Samsung further objects to the Request as overbroad in that it is not limited to any reasonable time
4 period and seeks documents and things from time periods not at issue in this litigation. Samsung
5 further objects to the Request to the extent the requested documents are publicly available.
6 Samsung further objects to the Request as premature to the extent it seeks documents and things
7 inconsistent with the timeframes set forth in the Northern District of California Patent Local
8 Rules.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 81:**

12 All engineering notebooks, laboratory notebooks, records, logs, and files relating to the
13 subject matter of any claim of the Samsung Patents-In-Suit.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
20 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
21 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.
22 Samsung further objects to the Request as overbroad in that it is not reasonably limited as to the
23 scope of documents and things it seeks. Samsung further objects to the Request as duplicative of
24 Apple’s Request For Production Nos. 64, 65, 66, 66, 69, 73, and 79. Samsung further objects to
25 the Request as premature to the extent it seeks documents and things inconsistent with the
26 timeframes set forth in the Northern District of California Patent Local Rules.

27 Subject to these objections, Samsung is willing to meet and confer with Apple about the
28 relevance and scope of the information sought by this request.

1 **REQUEST FOR PRODUCTION NO. 82:**

2 All documents relating to technical or scientific writings, whether published or not, that
3 were authored by, contributed to, or given in whole or in part by Samsung or any of the Samsung
4 Named Inventors relating to the subject matter of any of the Samsung Patents-In-Suit, including,
5 without limitation, patents, patent applications, articles, abstracts, publications, manuscripts,
6 papers, posters, presentations, speeches, technical disclosures, or Samsung internal technical
7 publications.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
15 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.
16 Samsung further objects to the Request to the extent it seeks documents equally or more readily
17 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
18 requested documents are publicly available.

19 Subject to these objections, Samsung is willing to meet and confer with Apple about the
20 relevance and scope of the information sought by this request.

21 **REQUEST FOR PRODUCTION NO. 83:**

22 All documents relating to Samsung’s decision to seek patent protection for the subject
23 matter of any claim of any Samsung Patent-In-Suit.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
27 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
28 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other

1 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
2 burdensome, and/or would require undue expense to answer. Samsung further objects to the
3 Request to the extent it seeks documents that are not relevant to the claims or defenses of any
4 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

5 Subject to these objections, Samsung is willing to meet and confer with Apple about the
6 relevance and scope of the information sought by this request.

7 **REQUEST FOR PRODUCTION NO. 84:**

8 All documents relating to the preparation, filing, and/or prosecution of each of the
9 Samsung Patents-In-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request to the extent it seeks documents equally or more readily available to Apple than to
18 Samsung. Samsung further objects to the Request to the extent the requested documents are
19 publicly available.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents
21 within its possession, custody, or control, if any, after conducting a reasonable search in
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 85:**

24 All references and prior art cited during the prosecution of each of the Samsung Patents-In-
25 Suit.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the
5 Request as duplicative of Apple's Request For Production Nos. 53, 56, 57, 58, and 84. Samsung
6 further objects to the Request to the extent it seeks documents equally or more readily available to
7 Apple than to Samsung. Samsung further objects to the Request to the extent the requested
8 documents are publicly available.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 86:**

12 All references and prior art cited during the prosecution of any foreign counterparts to the
13 Samsung Patents-In-Suit.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the
21 Request as duplicative of Apple's Request For Production Nos. 53, 54, 55, 56, 57, 58, and 84.
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
24 requested documents are publicly available.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the
26 relevance and scope of the information sought by this request.

1 **REQUEST FOR PRODUCTION NO. 87:**

2 All prior art to the Samsung Patents-In-Suit and any foreign counterparts to the Samsung
3 Patents-In-Suit in the possession, custody, or control of Samsung or the Samsung Named
4 Inventors.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the
12 Request as duplicative of Apple's Request For Production Nos. 84, 85, and 86. Samsung further
13 objects to the Request to the extent it seeks documents equally or more readily available to Apple
14 than to Samsung. Samsung further objects to the Request to the extent the requested documents
15 are publicly available. Samsung further objects to the Request as premature to the extent it seeks
16 documents and things inconsistent with the timeframes set forth in the Northern District of
17 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a
18 legal conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search in
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 88:**

23 All documents relating to any decision as to what reference to cite, or to not cite during the
24 prosecution of each of the Samsung Patents-In-Suit and any foreign counterparts thereto, including
25 without limitation all prior art search results.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the
5 Request as duplicative of Apple's Request For Production No. 84. Samsung further objects to the
6 Request to the extent it seeks documents equally or more readily available to Apple than to
7 Samsung.

8 Subject to these objections, Samsung will produce relevant, non-privileged documents
9 within its possession, custody, or control, if any, after conducting a reasonable search in
10 accordance with the Patent Local Rules.

11 **REQUEST FOR PRODUCTION NO. 89:**

12 All documents relating to any prior art, or possible prior art, to the subject matter of any
13 claim of the Samsung Patents-In-Suit. This includes without limitation documents or information
14 relating to patents, publications, prior knowledge, public uses, sales, or offers for sale.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 89:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
21 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
22 as vague and ambiguous. For example, the terms "subject matter of any claim" and "possible
23 prior art" are vague and ambiguous. Samsung further objects to the Request as overbroad in that it
24 is not reasonably limited as to the scope of documents and things it seeks. For example, the
25 Request seeks "possible prior art." Samsung further objects to the Request as duplicative of
26 Apple's Request For Production Nos. 84, 85, 86 and 87. Samsung further objects to the Request
27 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.
28 Samsung further objects to the Request to the extent it seeks documents equally or more readily

1 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
2 requested documents are publicly available. Samsung further objects to the Request as premature
3 to the extent it seeks documents and things inconsistent with the timeframes set forth in the
4 Northern District of California Patent Local Rules. Samsung further objects to the Request to the
5 extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents
7 within its possession, custody, or control, if any, after conducting a reasonable search in
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 90:**

10 All documents relating to any evaluation, analysis, or review of any prior art relating to the
11 Samsung Patents-In-Suit or any foreign counterparts thereto, including without limitation any
12 documents that refer to any prior art relating to the Samsung Patents-In-Suit or any foreign
13 counterparts thereto.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 90:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the
21 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
22 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production
23 Nos. 84, 85, 86, 87, and 89. Samsung further objects to the Request to the extent it seeks
24 documents equally or more readily available to Apple than to Samsung. Samsung further objects
25 to the Request to the extent the requested documents are publicly available. Samsung further
26 objects to the Request as premature to the extent it seeks documents and things inconsistent with
27 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung
28 further objects to the Request to the extent it calls for a legal conclusion.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 91:**

4 All documents relating to any search for or investigation of any prior art or other
5 information, regarding the patentability, validity, enforceability, or scope of the subject matter of
6 any claim of each of the Samsung Patents-In-Suit and any foreign counterpart thereto.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 91:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
13 burdensome, and/or would require undue expense to answer. Samsung further objects to the
14 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
15 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production
16 Nos. 84, 85, 86, 87, and 89. Samsung further objects to the Request to the extent it seeks
17 documents equally or more readily available to Apple than to Samsung. Samsung further objects
18 to the Request to the extent the requested documents are publicly available. Samsung further
19 objects to the Request as premature to the extent it seeks documents and things inconsistent with
20 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung
21 further objects to the Request to the extent it calls for a legal conclusion.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 92:**

25 All documents relating to any communication, meeting, or contact with the U.S. Patent and
26 Trademark Office or any foreign patent office relating to each of the Samsung Patents-In-Suit or
27 any foreign counterparts thereto.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 92:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as duplicative of Apple's Request For Production No. 84. Samsung further objects to the
9 Request to the extent it seeks documents equally or more readily available to Apple than to
10 Samsung. Samsung further objects to the Request to the extent the requested documents are
11 publicly available.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents
13 within its possession, custody, or control, if any, after conducting a reasonable search in
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 93:**

16 All documents relating to any right, title, chain-of-title, lien, ownership, or interest
17 (including without limitation transfer, sale, or assignment of such interest) in or relating to any
18 Samsung Patent-In-Suit.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 93:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the
26 Request to the extent it seeks documents that are not within the possession, custody, or control of
27 Samsung. Samsung further objects to the Request as premature to the extent it seeks documents
28 and things inconsistent with the timeframes set forth in the Northern District of California Patent

1 Local Rules. Samsung further objects to the Request to the extent it seeks documents equally or
2 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
3 extent the requested documents are publicly available.

4 Subject to these objections, Samsung will produce relevant, non-privileged documents
5 within its possession, custody, or control, if any, after conducting a reasonable search in
6 accordance with the Patent Local Rules.

7 **REQUEST FOR PRODUCTION NO. 94:**

8 All documents that Samsung contends or believes affect, limit, or bear on the interpretation
9 and/or construction of any claims of any of the Samsung Patents-In-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 94:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request to the extent it seeks documents equally or more readily available to Apple than to
18 Samsung. Samsung further objects to the Request to the extent the requested documents are
19 publicly available. Samsung further objects to the Request as premature to the extent it seeks
20 documents and things inconsistent with the timeframes set forth in the Northern District of
21 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a
22 legal conclusion.

23 Subject to these objections, Samsung is willing to meet and confer with Apple about the
24 relevance and scope of the information sought by this request.

25 **REQUEST FOR PRODUCTION NO. 95:**

26 All documents on which Samsung intends to rely in support of any proposed interpretation
27 and/or construction of any claims of any of the Samsung Patents-In-Suit.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 95:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request to the extent it seeks documents that are not within the possession, custody, or control of
9 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
10 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
11 extent the requested documents are publicly available. Samsung further objects to the Request as
12 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
13 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
14 the extent it calls for a legal conclusion.

15 Subject to these objections, Samsung is willing to meet and confer with Apple about the
16 relevance and scope of the information sought by this request.

17 **REQUEST FOR PRODUCTION NO. 96:**

18 All documents relating to any unique or specialized meaning (i.e., different from its
19 everyday common use) of any word or phrase contained in any claim of any of the Samsung
20 Patents-In-Suit.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 96:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
27 burdensome, and/or would require undue expense to answer. Samsung further objects to the
28 Request to the extent it seeks documents that are not within the possession, custody, or control of

1 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
2 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
3 extent the requested documents are publicly available. Samsung further objects to the Request as
4 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
5 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
6 the extent it calls for a legal conclusion.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 97:**

10 All documents relating to the level of ordinary skill in the art to which the subject matter of
11 any Samsung Patent-In-Suit pertains, including without limitation each document upon which
12 Samsung intends to rely in this Litigation to establish the level of ordinary skill in the art.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 97:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the
20 Request to the extent it seeks documents that are not within the possession, custody, or control of
21 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
22 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
23 extent the requested documents are publicly available. Samsung further objects to the Request as
24 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
25 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
26 the extent it calls for a legal conclusion.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 98:**

5 All documents relating to the patentability, validity, enforceability, or scope of any claim
6 of the Samsung Patents-In-Suit. This includes without limitation any documents relating to studies
7 or opinions relating to patentability, enforceability, or scope; or, to any assertion by any person
8 that the patent is valid, invalid, enforceable, or unenforceable.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 98:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the
16 Request to the extent it seeks documents that are not within the possession, custody, or control of
17 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
18 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
19 extent the requested documents are publicly available. Samsung further objects to the Request as
20 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
21 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
22 the extent it calls for a legal conclusion.

23 Subject to these objections, Samsung will produce relevant, non-privileged documents
24 within its possession, custody, or control, if any, after conducting a reasonable search in
25 accordance with the Patent Local Rules.

26 **REQUEST FOR PRODUCTION NO. 99:**

27 All documents relating to any mode of practicing the subject matter of each claim of the
28 Samsung Patents-In-Suit, including without limitation the best mode.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 99:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
9 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within
10 the possession, custody, or control of Samsung. Samsung further objects to the Request to the
11 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung
12 further objects to the Request to the extent the requested documents are publicly available.
13 Samsung further objects to the Request as premature to the extent it seeks documents and things
14 inconsistent with the timeframes set forth in the Northern District of California Patent Local
15 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

16 Subject to these objections, Samsung will produce relevant, non-privileged documents
17 within its possession, custody, or control, if any, after conducting a reasonable search in
18 accordance with the Patent Local Rules.

19 **REQUEST FOR PRODUCTION NO. 100:**

20 All documents relating to each mode, feature, aspect, or alternative design, which is not
21 disclosed in the specifications of the Samsung Patents-In-Suit, but which allegedly embodies, falls
22 within the scope of, or is made in accordance with any claim of, the Samsung Patents-In-Suit or
23 any Related Patents.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 100:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
27 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
28 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other

1 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
2 burdensome, and/or would require undue expense to answer. Samsung further objects to the
3 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
4 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production
5 No. 99. Samsung further objects to the Request to the extent it seeks documents that are not
6 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
7 the extent it seeks documents equally or more readily available to Apple than to Samsung.
8 Samsung further objects to the Request to the extent the requested documents are publicly
9 available. Samsung further objects to the Request as premature to the extent it seeks documents
10 and things inconsistent with the timeframes set forth in the Northern District of California Patent
11 Local Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents
13 within its possession, custody, or control, if any, after conducting a reasonable search in
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 101:**

16 All documents relating to any written description of any claim of any of the Samsung
17 Patents-In-Suit, including without limitation all invention disclosures or invention reports and
18 other written descriptions authored by any of the Samsung Named Inventors.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 101:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the
26 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
27 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within
28 the possession, custody, or control of Samsung. Samsung further objects to the Request to the

1 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung
2 further objects to the Request to the extent the requested documents are publicly available.
3 Samsung further objects to the Request as premature to the extent it seeks documents and things
4 inconsistent with the timeframes set forth in the Northern District of California Patent Local
5 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents
7 within its possession, custody, or control, if any, after conducting a reasonable search in
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 102:**

10 All documents relating to the first disclosure to a person (whether employed by Samsung
11 or not), other than a Samsung Named Inventor, of the subject matter of any claim of the Samsung
12 Patents-In-Suit.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 102:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the
20 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
21 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within
22 the possession, custody, or control of Samsung. Samsung further objects to the Request to the
23 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung
24 further objects to the Request to the extent the requested documents are publicly available.
25 Samsung further objects to the Request as premature to the extent it seeks documents and things
26 inconsistent with the timeframes set forth in the Northern District of California Patent Local
27 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 103:**

5 All documents relating to the first public disclosure, first public use, first public
6 demonstration, first offer for sale, and/or first sale of the subject matter claimed in any claim of a
7 Samsung Patent-In-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 103:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request to the extent it seeks documents that are not within the possession, custody, or control of
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
17 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
18 extent the requested documents are publicly available. Samsung further objects to the Request as
19 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
20 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
21 the extent it calls for a legal conclusion.

22 Subject to these objections, Samsung will produce relevant, non-privileged documents
23 within its possession, custody, or control, if any, after conducting a reasonable search in
24 accordance with the Patent Local Rules.

25 **REQUEST FOR PRODUCTION NO. 104:**

26 For each of the Samsung Patents-In-Suit, all documents relating to any disclosure or
27 publication of the subject matter of any claim of such patent sent to, shared with, or disseminated
28 to any person or entity other than Samsung before the filing date of such patent, including without

1 limitation any pre-filing date sales, offers for sale, public uses, demonstrations, announcements,
2 advertisements, or publications.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 104:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the
10 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
11 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within
12 the possession, custody, or control of Samsung. Samsung further objects to the Request to the
13 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung
14 further objects to the Request to the extent the requested documents are publicly available.
15 Samsung further objects to the Request as premature to the extent it seeks documents and things
16 inconsistent with the timeframes set forth in the Northern District of California Patent Local
17 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

18 Subject to these objections, Samsung will produce relevant, non-privileged documents
19 within its possession, custody, or control, if any, after conducting a reasonable search in
20 accordance with the Patent Local Rules.

21 **REQUEST FOR PRODUCTION NO. 105:**

22 Documents sufficient to identify and show in detail each design around, alternative
23 manufacturing process, and/or alternative technology or method that can be used as a commercial
24 alternative to the patented technology of each of the Samsung Patents-In-Suit.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 105:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the
4 Request to the extent it seeks documents that are not within the possession, custody, or control of
5 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
6 more readily available to Apple than to Samsung. Samsung further objects to the Request to the
7 extent the requested documents are publicly available. Samsung further objects to the Request as
8 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
9 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
10 the extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it
11 calls for a legal conclusion.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents
13 within its possession, custody, or control, if any, after conducting a reasonable search in
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 106:**

16 All minutes, memoranda, notes, or other documents relating to any discussions or
17 negotiations for licenses to, covenants not to sue to, or rights to practice any Samsung Patent-in-
18 Suit.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 106:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the
26 Request to the extent it seeks documents that are not within the possession, custody, or control of
27 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
28 more readily available to Apple than to Samsung. Samsung further objects to the Request to the

1 extent the requested documents are publicly available. Samsung further objects to the Request to
2 the extent it seeks documents containing confidential third party information, including
3 information subject to a non-disclosure or other agreement between Samsung and a third party.
4 Samsung further objects to the Request to the extent it seeks documents subject to a protective
5 order or under seal.

6 Subject to these objections, Samsung is willing to meet and confer with Apple about the
7 relevance and scope of the information sought by this request.

8 **REQUEST FOR PRODUCTION NO. 107:**

9 Documents sufficient to identify all people who have communicated with Apple regarding
10 any Samsung Patent-in-Suit.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 107:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
19 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
20 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
21 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks
22 documents that are not within the possession, custody, or control of Samsung. Samsung further
23 objects to the Request to the extent it seeks documents equally or more readily available to Apple
24 than to Samsung. Samsung further objects to the Request to the extent the requested documents
25 are publicly available. Samsung further objects to this request as oppressive and harassing
26 inasmuch as it implies Samsung engaged in copying and other illegal activity. Samsung further
27 objects to the Request to the extent it seeks documents containing confidential third party
28

1 information, including information subject to a non-disclosure or other agreement between
2 Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 108:**

7 All documents relating to communications between Samsung and Apple relating to any
8 Patent-in-Suit. This request includes without limitation any discussion concerning licensing or
9 alleged infringement.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 108:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request to the extent it seeks documents that are not within the possession, custody, or control of
18 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
19 more readily available to Apple than to Samsung.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 109:**

23 All documents relating to any notice given by Samsung to Apple about any Samsung
24 Patent-in-Suit, including without limitation any notice reflecting Samsung's contention that Apple
25 was or is infringing any of the Samsung Patents-In-Suit. This request includes without limitation
26 any communications between the parties or their representatives on the issue of such notice or on
27 the issue of alleged infringement.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 109:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as duplicative of Apple's Request For Production No. 108. Samsung further objects to
9 the Request to the extent it seeks documents that are not within the possession, custody, or control
10 of Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
11 more readily available to Apple than to Samsung.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents
13 within its possession, custody, or control, if any, after conducting a reasonable search in
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 110:**

16 All documents relating to plans, suggestions, decisions, discussions, or contemplated
17 action regarding the bringing or institution of this or any action for alleged patent infringement
18 against Apple, including without limitation all corporate minutes and all other documents and
19 things concerning meetings of the Board of Directors, Executive Committee, other board
20 committees, stockholders or any other of Samsung's corporate boards, committees, or
21 subcommittees.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 110:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
28 burdensome, and/or would require undue expense to answer.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 111:**

4 All documents relating to any communication between Samsung and any other person or
5 entity concerning the alleged infringement by Apple of any Samsung Patent-in-Suit.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 111:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
11 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
12 burdensome, and/or would require undue expense to answer. Samsung further objects to the
13 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
14 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
15 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
16 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks
17 documents that are not within the possession, custody, or control of Samsung. Samsung further
18 objects to the Request to the extent it seeks documents equally or more readily available to Apple
19 than to Samsung. Samsung further objects to the Request to the extent the requested documents
20 are publicly available. Samsung further objects to the Request to the extent it seeks documents
21 containing confidential third party information, including information subject to a non-disclosure
22 or other agreement between Samsung and a third party.

23 Subject to these objections, Samsung is willing to meet and confer with Apple about the
24 relevance and scope of the information sought by this request.

25 **REQUEST FOR PRODUCTION NO. 112:**

26 To the extent not duplicative of previous requests, all documents relating to any alleged
27 infringement or willful infringement of any Samsung Patent-in-Suit by Apple.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 112:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as premature to the extent it seeks documents and things inconsistent with the timeframes
9 set forth in the Northern District of California Patent Local Rules. Samsung further objects to the
10 Request to the extent it calls for a legal conclusion.

11 Subject to these objections, Samsung will produce relevant, non-privileged documents
12 within its possession, custody, or control, if any, after conducting a reasonable search in
13 accordance with the Patent Local Rules.

14 **REQUEST FOR PRODUCTION NO. 113:**

15 All documents relating to any policy, practice, custom, guideline, or procedure of Samsung
16 with respect to licensing patents or any intellectual property.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 113:**

18 In addition to its Objections and Responses Common to All Requests for Production,
19 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
20 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
21 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
22 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
23 burdensome, and/or would require undue expense to answer. Samsung further objects to the
24 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
25 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
26 reasonable time period and seeks documents and things from time periods not at issue in this
27 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
28 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the

1 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks
2 documents containing confidential third party information, including information subject to a non-
3 disclosure or other agreement between Samsung and a third party.

4 Subject to these objections, Samsung is willing to meet and confer with Apple about the
5 relevance and scope of the information sought by this request.

6 **REQUEST FOR PRODUCTION NO. 114:**

7 All documents relating to any valuation of any Samsung Patent-in-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 114:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request to the extent it seeks documents that are not within the possession, custody, or control of
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or
17 more readily available to Apple than to Samsung. Samsung further objects to the Request as
18 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
19 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
20 the extent it seeks documents containing confidential third party information, including
21 information subject to a non-disclosure or other agreement between Samsung and a third party.

22 Subject to these objections, Samsung will produce relevant, non-privileged documents
23 within its possession, custody, or control, if any, after conducting a reasonable search in
24 accordance with the Patent Local Rules.

25 **REQUEST FOR PRODUCTION NO. 115:**

26 Documents sufficient to show royalties and any other payments paid to Samsung by each
27 licensee or sublicensee, on a quarterly and annual basis, pursuant to any license or sublicense
28

1 granted under any of the Samsung Patents-In-Suit or under a portfolio including any Samsung
2 Patent-In-Suit

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 115:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the
10 Request as duplicative of Apple's Request For Production No. 121. Samsung further objects to
11 the Request to the extent it seeks documents containing confidential third party information,
12 including information subject to a non-disclosure or other agreement between Samsung and a third
13 party.

14 Subject to these objections, Samsung will produce relevant, non-privileged documents
15 within its possession, custody, or control, if any, after conducting a reasonable search in
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 116:**

18 Documents sufficient to identify all persons involved in licensing the Samsung Patents-In-
19 Suit.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 116:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
23 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
24 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
25 applicable privilege or immunity. Samsung objects to the term "involved in" as vague and
26 ambiguous. Samsung further objects to the Request to the extent it is unduly burdensome, and/or
27 would require undue expense to answer. Samsung further objects to the Request to the extent it
28

1 seeks documents containing confidential third party information, including information subject to
2 a non-disclosure or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 117:**

7 All documents provided to Samsung's licensees regarding the use, design, development,
8 testing, manufacture, and operation of any product embodying the invention claimed in any claim
9 of any Samsung Patent-In-Suit, including without limitation instruction product manuals, data
10 sheets, installation manuals, retail kits, diagnostic software, installation software, or specifications.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 117:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
19 seeks. Samsung further objects to the term "licensees" as vague, ambiguous and overly broad, and
20 interprets the term to mean "licensees of any Samsung Patent-In-Suit." Samsung further objects to
21 the Request to the extent it seeks documents that are not within the possession, custody, or control
22 of Samsung. Samsung further objects to the Request to the extent it seeks documents containing
23 confidential third party information, including information subject to a non-disclosure or other
24 agreement between Samsung and a third party.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the
26 relevance and scope of the information sought by this request.

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1 **REQUEST FOR PRODUCTION NO. 118:**

2 All documents relating to the research, design, development, structure, operation,
3 performance, assembly, manufacture, packaging, use, testing, sampling, importation, sale, or offer
4 for sale of any product or process (a) that is licensed under any Samsung Patent-in-Suit, or (b) that
5 allegedly practices, incorporates, or embodies any claim of any Samsung Patent-in-Suit. This
6 includes without limitation engineering notebooks, lab notebooks, blueprints, design reports,
7 illustrations, diagrams, test specifications, data sheets, flow charts, drawings, specifications,
8 control drawings, sales outline drawings, engineering documents, schematic diagrams, process
9 schematics, design documents, project books, project files, manufacturing documents,
10 procurement documents (including all invoices), requests for proposals, requests for quotations,
11 and correspondence for all versions of any prototype, prototypes, engineering models, or other
12 physical models.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 118:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
19 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
20 as vague and ambiguous. For example, the term “process” is vague and ambiguous. Samsung
21 further objects to the Request as overbroad in that it is not reasonably limited as to the scope of
22 documents and things it seeks. Samsung further objects to the Request as overbroad in that it
23 seeks documents and things that pertain to products not at issue in this litigation. Samsung further
24 objects to the Request as overbroad in that it seeks documents and things that bear on occurrences
25 in other countries that are not at issue in this litigation. Samsung further objects to the Request as
26 overbroad in that it is not limited to any reasonable time period and seeks documents and things
27 from time periods not at issue in this litigation. Samsung further objects to the Request to the
28 extent it seeks documents that are not within the possession, custody, or control of Samsung.

1 Samsung further objects to the Request to the extent it seeks documents equally or more readily
2 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
3 requested documents are publicly available. Samsung further objects to the Request as premature
4 to the extent it seeks documents and things inconsistent with the timeframes set forth in the
5 Northern District of California Patent Local Rules. Samsung further objects to the Request to the
6 extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it seeks
7 documents containing confidential third party information, including information subject to a non-
8 disclosure or other agreement between Samsung and a third party.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 119:**

12 All documents concerning or comprising licenses of or agreements to license any IPR
13 related to any of the Defined Wireless Standards, including without limitation licenses of such IPR
14 from Samsung to third parties and licenses of such IPR from third parties to Samsung.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 119:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
21 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
22 as vague and ambiguous. For example, the term “IPR” is vague and ambiguous. Samsung further
23 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”
24 Samsung further objects to the Request to the extent it seeks documents that are not within the
25 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent
26 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further
27 objects to the Request to the extent the requested documents are publicly available. Samsung
28 further objects to the Request to the extent it seeks documents containing confidential third party

1 information, including information subject to a non-disclosure or other agreement between
2 Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 120:**

7 All documents relating to the negotiation of any license of or agreement to license any
8 technology allegedly Essential to any Defined Wireless Standards, including without limitation,
9 documents reflecting discussions between the parties, licensing presentations, claim charts, and
10 documents identifying the Samsung personnel who negotiated or authorized any such licenses or
11 license agreement.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 120:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
17 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
18 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
19 as vague and ambiguous. For example, the term “IPR” is vague and ambiguous. Samsung
20 further objects to the Request as overbroad in that it is not limited to any reasonable time period
21 and seeks documents and things from time periods not at issue in this litigation. Samsung further
22 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”
23 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the
24 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
25 admissible evidence. Samsung further objects to the Request to the extent it seeks documents that
26 are not within the possession, custody, or control of Samsung. Samsung further objects to the
27 Request to the extent it seeks documents equally or more readily available to Apple than to
28 Samsung. Samsung further objects to the Request to the extent the requested documents are

1 publicly available. Samsung further objects to the Request to the extent it seeks documents
2 containing confidential third party information, including information subject to a non-disclosure
3 or other agreement between Samsung and a third party.

4 Subject to these objections, Samsung is willing to meet and confer with Apple about the
5 relevance and scope of the information sought by this request.

6 **REQUEST FOR PRODUCTION NO. 121:**

7 Documents sufficient to show all royalty amounts and royalty payments on any license
8 identified in response to any Apple document request, including but not limited to the royalties
9 Samsung has collected for any of Samsung's Alleged Essential Technology related to any of the
10 Defined Wireless Standards.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 121:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
19 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
20 reasonable time period and seeks documents and things from time periods not at issue in this
21 litigation. Samsung further objects to the Request as overly burdensome for its use of the terms
22 "Samsung's Alleged Essential Technology" and "Defined Wireless Standards." Samsung further
23 objects to the Request to the extent it seeks documents that are not relevant to the claims or
24 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
25 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
26 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
27 the extent the requested documents are publicly available. Samsung further objects to the Request
28

1 to the extent it seeks documents containing confidential third party information, including
2 information subject to a non-disclosure or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 122:**

7 All documents relating to or constituting any potential or actual agreement-whether formal
8 or informal-among Samsung and any third party or third parties to refrain from disclosing the
9 terms of any license to any patent claimed to be Essential to any Defined Wireless Standards to
10 any non-party to the license agreement.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 122:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
17 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
18 as vague and ambiguous. For example, the term "potential or actual agreement" is vague and
19 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably
20 limited as to the scope of documents and things it seeks. Samsung further objects to the Request
21 as overly burdensome for its use of the term "Defined Wireless Standards." Samsung further
22 objects to the Request to the extent it seeks documents that are not relevant to the claims or
23 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
24 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
25 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
26 the extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it
27 seeks documents containing confidential third party information, including information subject to
28 a non-disclosure or other agreement between Samsung and a third party.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 123:**

4 All documents relating to the evaluation, valuation, or attempt to estimate the actual or
5 potential value of any patent portfolio or individual patent that is claimed by the patentee to be
6 Essential, in whole or in part, to any of the Defined Wireless Standards, including without
7 limitation documents relating to the technical merit of any such patents or patent portfolios, and
8 estimates of the strength or value of any such patents or patent portfolios.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 123:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the
16 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
17 and things from time periods not at issue in this litigation. Samsung further objects to the Request
18 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further
19 objects to the Request to the extent it seeks documents that are not relevant to the claims or
20 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
21 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
22 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
23 the extent it seeks documents equally or more readily available to Apple than to Samsung.
24 Samsung further objects to the Request to the extent the requested documents are publicly
25 available. Samsung further objects to the Request to the extent it seeks documents containing
26 confidential third party information, including information subject to a non-disclosure or other
27 agreement between Samsung and a third party.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 124:**

5 All documents concerning or comprising covenants not to sue on any IPR relating to any
6 of the Defined Wireless Standards.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 124:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
13 burdensome, and/or would require undue expense to answer. Samsung further objects to the
14 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
15 seeks. For example, the Request seeks agreements between parties having no relation to this
16 litigation. Samsung further objects to the Request as overbroad in that it is not limited to any
17 reasonable time period and seeks documents and things from time periods not at issue in this
18 litigation. Samsung further objects to the Request as overly burdensome for its use of the term
19 “Defined Wireless Standards.” Samsung further objects to the Request to the extent it seeks
20 documents that are not relevant to the claims or defenses of any party and/or not reasonably
21 calculated to lead to the discovery of admissible evidence. Samsung further objects to the Request
22 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.
23 Samsung further objects to the Request to the extent it seeks documents equally or more readily
24 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
25 requested documents are publicly available. Samsung further objects to the Request to the extent
26 it seeks documents containing confidential third party information, including information subject
27 to a non-disclosure or other agreement between Samsung and a third party.

28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 125:**

5 Documents sufficient to show all sales, assignments, distributions, grants, or other
6 disbursements by Samsung of ownership rights in IPR that Samsung claims, has claimed, believes,
7 or has believed are, or were at any point, Essential to any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 125:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
16 and things from time periods not at issue in this litigation. Samsung further objects the Request as
17 vague and ambiguous. For example, the term “sales, assignments, distributions, grants, or other
18 disbursements” is vague and ambiguous. Samsung further objects to the Request as overbroad in
19 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further
20 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”
21 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the
22 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
23 admissible evidence. Samsung further objects to the Request to the extent it seeks documents that
24 are not within the possession, custody, or control of Samsung. Samsung further objects to the
25 Request to the extent the requested documents are publicly available. Samsung further objects to
26 the Request to the extent it seeks documents containing confidential third party information,
27 including information subject to a non-disclosure or other agreement between Samsung and a third
28 party.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 126:**

5 Documents sufficient to show all purchases or other acquisitions by Samsung of ownership
6 rights in IPR that Samsung claims, has claimed, believes, or has believed are, or were at any point,
7 Essential to any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 126:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
16 and things from time periods not at issue in this litigation. Samsung further objects the Request as
17 vague and ambiguous. For example, the term “purchases or other acquisitions” is vague and
18 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably
19 limited as to the scope of documents and things it seeks. Samsung further objects to the Request
20 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further
21 objects to the Request to the extent it seeks documents that are not relevant to the claims or
22 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
23 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
24 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
25 the extent the requested documents are publicly available. Samsung further objects to the Request
26 to the extent it seeks documents containing confidential third party information, including
27 information subject to a non-disclosure or other agreement between Samsung and a third party.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 127:**

5 All documents relating to discussions between Samsung and Apple relating to the licensing
6 of patents claimed to be Essential to any Defined Wireless Standards and patents not claimed to be
7 Essential to any Defined Wireless Standards, including without limitation requests from Samsung
8 to license Apple's patents, offers from Samsung to license Samsung's patents, requests from
9 Apple to license Samsung's patents, offers from Apple to license Apple's patents, responses to
10 any such requests and offers, analyses or discussions of royalties, valuations or attempts to
11 estimate the actual or potential value of the license requested or offered, applicable revenue
12 streams and projections, and Samsung's requests for an option to license certain of Apple's patents
13 at a later date.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 127:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the
21 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
22 and things from time periods not at issue in this litigation. Samsung further objects to the Request
23 as overly burdensome for its use of the term "Defined Wireless Standards." Samsung further
24 objects to the Request to the extent it seeks documents that are not within the possession, custody,
25 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents
26 equally or more readily available to Apple than to Samsung. Samsung further objects to the
27 Request as premature to the extent it seeks documents and things inconsistent with the timeframes
28

1 set forth in the Northern District of California Patent Local Rules. Samsung further objects to the
2 Request to the extent it calls for a legal conclusion.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents
4 within its possession, custody, or control, if any, after conducting a reasonable search in
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 128:**

7 All documents relating to Samsung's understanding of the meaning of RAND licensing
8 terms, including without limitation statements to SSOs, statements in litigation, statements to
9 actual or potential licensees, and/or presentations or other statements made in public fora.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 128:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
18 and things from time periods not at issue in this litigation. Samsung further objects to the Request
19 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
20 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
21 objects to the Request as premature to the extent it seeks documents and things inconsistent with
22 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung
23 further objects to the Request to the extent it calls for a legal conclusion.

24 Subject to these objections, Samsung is willing to meet and confer with Apple about the
25 relevance and scope of the information sought by this request.

26 **REQUEST FOR PRODUCTION NO. 129:**

27 All documents relating to actual, proposed, contemplated, or appropriate FRAND royalty
28 rates for any of Samsung's Alleged Essential Technology.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 129:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request
10 as overly burdensome for its use of the term “Samsung’s Alleged Essential Technology.”
11 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the
12 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
13 admissible evidence. Samsung further objects to the Request to the extent it seeks documents
14 containing confidential third party information, including information subject to a non-disclosure
15 or other agreement between Samsung and a third party. Samsung further objects to the Request as
16 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in
17 the Northern District of California Patent Local Rules. Samsung further objects to the Request to
18 the extent it calls for a legal conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search in
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 130:**

23 All documents concerning discussions between or among Samsung and any other ETSI
24 member regarding (i) the grant of royalty-free cross licenses for IPR claimed to be essential to any
25 of the Defined Wireless Standards; (ii) the FRAND royalty rates to be charged or paid for licenses
26 to IPR claimed to be essential to any of the Defined Wireless Standards; and/or (iii) any actual or
27 potential cumulative royalty cap of 5% or otherwise (and any components thereof) on royalties
28 paid for IPR claimed to be essential to any of the Defined Wireless Standards.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 130:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request
10 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further
11 objects to the Request to the extent it seeks documents that are not relevant to the claims or
12 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
13 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
14 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
15 the extent it seeks documents equally or more readily available to Apple than to Samsung.
16 Samsung further objects to the Request to the extent it seeks documents containing confidential
17 third party information, including information subject to a non-disclosure or other agreement
18 between Samsung and a third party.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents
20 within its possession, custody, or control, if any, after conducting a reasonable search in
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 131:**

23 All documents relating to or comprising communications, statements, submissions, or
24 presentations by Samsung regarding licensor demands—including demands made by Samsung for
25 licenses of patents not Essential to any standard in exchange for a license to some or all of the
26 licensor’s—including Samsung’s—patents that are claimed to be Essential to a standard.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 131:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request
10 since it is vague and ambiguous, and it is unclear what information Apple seeks. Samsung further
11 objects to the Request to the extent it seeks documents that are not relevant to the claims or
12 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
13 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
14 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
15 the extent it seeks documents containing confidential third party information, including
16 information subject to a non-disclosure or other agreement between Samsung and a third party.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 132:**

20 All documents concerning any actual or potential resistance, reluctance or refusal by any
21 person participating in the standardization process for any Defined Wireless Standard not to
22 license its IPR to others on FRAND terms, including without limitation documents concerning
23 Samsung's reaction and positions, public statements by Samsung, and any internal discussions
24 within Samsung concerning any such resistance, reluctance or refusal.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 132:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the
4 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
5 and things from time periods not at issue in this litigation. Samsung further objects to the Request
6 as overly burdensome for its use of the overly broad term “Defined Wireless Standards.”
7 Samsung further objects to the Request since it is vague and ambiguous, and it is unclear what
8 information Apple seeks. Samsung further objects to the Request to the extent it seeks documents
9 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
10 to the discovery of admissible evidence. Samsung further objects to the Request to the extent it
11 seeks documents that are not within the possession, custody, or control of Samsung. Samsung
12 further objects to the Request to the extent it seeks documents containing confidential third party
13 information, including information subject to a non-disclosure or other agreement between
14 Samsung and a third party.

15 Subject to these objections, Samsung is willing to meet and confer with Apple about the
16 relevance and scope of the information sought by this request.

17 **REQUEST FOR PRODUCTION NO. 133:**

18 All documents relating to industry customs, practices, or policies with respect to the
19 licensing of patents claimed to be Essential to any standard that covers Mobile Wireless
20 Telecommunications Devices.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 133:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
27 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
28 as vague and ambiguous. For example, the term “industry customs, practices, or policies” is

1 vague and ambiguous. Samsung further objects to the Request as overbroad in that it seeks
2 documents and things that pertain to products not at issue in this litigation. Samsung further
3 objects to the Request as overly burdensome for its use of the overly broad term “any standard that
4 covers Mobile Wireless Telecommunications Devices.” Samsung further objects to the Request as
5 overbroad in that it is not limited to any reasonable time period and seeks documents and things
6 from time periods not at issue in this litigation. Samsung further objects to the Request to the
7 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not
8 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to
9 the Request as premature to the extent it seeks documents and things inconsistent with the
10 timeframes set forth in the Northern District of California Patent Local Rules. Samsung further
11 objects to the Request to the extent it calls for a legal conclusion.

12 Subject to these objections, Samsung is willing to meet and confer with Apple about the
13 relevance and scope of the information sought by this request.

14 **REQUEST FOR PRODUCTION NO. 134:**

15 All documents relating to any Samsung plan, whether adopted or not, for the development,
16 marketing or licensing of IPR that is Essential or allegedly Essential to any of the Defined
17 Wireless Standards, including without limitation, business plans, short-term and long-range
18 strategies and objectives, budgets and financial projections, research and development plans,
19 technology licensing plans, valuations or attempts to estimate the actual or potential value of the
20 license, and presentations to management committees, executive committees, and boards of
21 directors.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 134:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
28 burdensome, and/or would require undue expense to answer. Samsung further objects to the

1 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
2 and things from time periods not at issue in this litigation. Samsung further objects to the Request
3 as overly burdensome for its use of the terms “any Samsung plan, whether adopted or not” and
4 “IPR that is Essential or allegedly Essential to any of the Defined Wireless Standards.” Samsung
5 further objects to the Request to the extent it seeks documents that are not relevant to the claims or
6 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
7 evidence. Samsung further objects to the Request to the extent it seeks highly confidential
8 documents containing sensitive proprietary business information, the disclosure of which would
9 cause Samsung substantial competitive harm.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 135:**

13 All documents relating to any submission, filing, or communication by or between
14 Samsung and any of the Defined Wireless SSOs relating to Samsung’s licensing of any
15 technology that is Essential or allegedly Essential to any Defined Wireless Standards, including
16 without limitation licensing by Samsung on FRAND terms and any declarations made pursuant to
17 the IPR policy of any of the Defined Wireless SSOs.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 135:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
24 burdensome, and/or would require undue expense to answer. Samsung further objects to the
25 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
26 seeks. Samsung further objects to the Request as overly burdensome for its use of the overly
27 broad terms “Defined Wireless SSOs” and “Defined Wireless Standards.” Samsung further
28 objects to the Request to the extent it seeks documents that are not relevant to the claims or

1 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
2 evidence. Samsung further objects to the Request to the extent it seeks documents that are not
3 within the possession, custody, or control of Samsung. Samsung further objects to the Request to
4 the extent the requested documents are publicly available. Samsung further objects to the Request
5 to the extent it seeks documents containing confidential third party information, including
6 information subject to a non-disclosure or other agreement between Samsung and a third party.

7 Subject to these objections, Samsung will produce relevant, non-privileged documents
8 within its possession, custody, or control, if any, after conducting a reasonable search in
9 accordance with the Patent Local Rules.

10 **REQUEST FOR PRODUCTION NO. 136:**

11 Documents sufficient to identify Samsung's membership or participation in any of the
12 Defined Wireless SSOs that have developed any of the Defined Wireless Standards, the dates of
13 any such participation, and the names and titles of individuals representing or affiliated with
14 Samsung in connection with such participation.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 136:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
21 burdensome, and/or would require undue expense to answer. Samsung further objects to the
22 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request as overly burdensome for its use of the overly
24 broad terms "Defined Wireless SSOs" and "Defined Wireless Standards." Samsung further
25 objects to the Request to the extent it seeks documents that are not relevant to the claims or
26 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
27 evidence. Samsung further objects to the Request to the extent the requested documents are
28 publicly available.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 137:**

5 All documents relating to technical proposals, responses to others' technical proposals,
6 reports, change requests, responses to others' change requests, emails or other communications,
7 related to any Samsung technology, that were submitted or sent by Samsung to a working group or
8 body operating under the auspices of any of the Defined Wireless SSOs, or were received by or
9 sent to Samsung by a participant in such a Defined Wireless SSO working group or body.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 137:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the
17 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
18 and things from time periods not at issue in this litigation. Samsung further objects to the Request
19 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
20 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
21 objects to the Request as vague, ambiguous, and overly burdensome for its use of the terms "any
22 Samsung technology," "body operating under the auspices of any of the Defined Wireless SSOs"
23 and "Defined Wireless SSOs" Samsung further objects to the Request to the extent it seeks
24 documents that are not within the possession, custody, or control of Samsung. Samsung further
25 objects to the Request to the extent it seeks documents equally or more readily available to Apple
26 than to Samsung. Samsung further objects to the Request to the extent the requested documents
27 are publicly available. Samsung further objects to the Request to the extent it seeks documents
28

1 containing confidential third party information, including information subject to a non-disclosure
2 or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 138:**

6 All documents relating to the evaluation, adoption, or incorporation by a Defined Wireless
7 SSO of any of Samsung's Alleged Essential Technology into any of the Defined Wireless
8 Standards.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 138:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the
16 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
17 seeks. Samsung further objects to the Request to the extent it seeks documents that are not
18 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
19 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome
20 for its use of the overly broad terms "Defined Wireless SSO," "Samsung's Alleged Essential
21 Technology," and "Defined Wireless Standards." Samsung further objects to the Request to the
22 extent it seeks documents that are not within the possession, custody, or control of Samsung.
23 Samsung further objects to the Request to the extent it seeks documents equally or more readily
24 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
25 requested documents are publicly available.

26 Subject to these objections, Samsung will produce relevant, non-privileged documents
27 within its possession, custody, or control, if any, after conducting a reasonable search in
28 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 139:**

2 All documents relating to evaluating, analyzing, or discussing actual or potential
3 alternatives to technologies that Samsung has proposed for inclusion in any of the Defined
4 Wireless Standards.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 139:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
11 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
12 as vague and ambiguous. For example, the term “actual or potential alternatives” is vague and
13 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably
14 limited as to the scope of documents and things it seeks. Samsung further objects to the Request
15 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
16 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
17 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined
18 Wireless Standards.” Samsung further objects to the Request as premature to the extent it seeks
19 documents and things inconsistent with the timeframes set forth in the Northern District of
20 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a
21 legal conclusion.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 140:**

25 Documents sufficient to show any incentives, awards, bonuses, compensation, or special
26 payments provided by Samsung to inventors, including without limitation inventors of the
27 Samsung Patents-In-Suit, or anyone acting on Samsung’s behalf, in consideration of filing patents
28 or patent applications that may be or are declared essential to a Defined Wireless Standard.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 140:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request
10 as overly burdensome for its use of the overly broad definition of “Defined Wireless Standards.”
11 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the
12 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to these objections, Samsung is willing to meet and confer with Apple about the
15 relevance and scope of the information sought by this request.

16 **REQUEST FOR PRODUCTION NO. 141:**

17 Documents sufficient to show any incentives, awards, bonuses, compensation, or special
18 payments provided by Samsung to employees or anyone acting on Samsung’s behalf in
19 consideration for having Samsung IPR proposed for adoption or adopted as part of a Defined
20 Wireless Standard.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 141:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
27 burdensome, and/or would require undue expense to answer. Samsung further objects to the
28 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it

1 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
2 reasonable time period and seeks documents and things from time periods not at issue in this
3 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly
4 broad definition of “Defined Wireless Standards.” Samsung further objects to the Request to the
5 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not
6 reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 142:**

10 All documents relating to Samsung’s identification, disclosure, or notification to any of the
11 Defined Wireless SSOs of any of Samsung’s technology as Essential or allegedly Essential to any
12 of the Defined Wireless Standards.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 142:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the
20 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
21 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
22 reasonable time period and seeks documents and things from time periods not at issue in this
23 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly
24 broad terms “Defined Wireless SSOs,” “Samsung’s Alleged Essential Technology,” and “Defined
25 Wireless Standards.” Samsung further objects to the Request to the extent it seeks documents that
26 are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead to
27 the discovery of admissible evidence.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 143:**

5 All documents relating to any technology that was submitted to or considered by a Defined
6 Wireless SSO as an actual or potential alternative to Samsung's Alleged Essential Technology in
7 any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 143:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the
15 Request to the extent it seeks documents that are not relevant to the claims or defenses of any
16 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
17 further objects to the Request as overly burdensome for its use of the overly broad terms "Defined
18 Wireless SSO," "Samsung's Alleged Essential Technology," and "Defined Wireless Standards."
19 Samsung further objects the Request as vague and ambiguous. For example, the term "actual or
20 potential alternatives" is vague and ambiguous. Samsung further objects to the Request to the
21 extent it seeks documents that are not within the possession, custody, or control of Samsung.
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the
24 requested documents are publicly available. Samsung further objects to the Request as premature
25 to the extent it seeks documents and things inconsistent with the timeframes set forth in the
26 Northern District of California Patent Local Rules. Samsung further objects to the Request to the
27 extent it calls for a legal conclusion.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents
2 within its possession, custody, or control, if any, after conducting a reasonable search in
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 144:**

5 All documents relating to Samsung’s understanding of, and compliance with, any IPR
6 practice, policy, or procedure of any of the Defined Wireless SSOs to disclose Essential IPR
7 during the standardization process of any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 144:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
14 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
15 as vague and ambiguous. For example, the term “Samsung’s understanding of, and compliance
16 with,” is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is
17 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects
18 to the Request as overbroad in that it is not limited to any reasonable time period and seeks
19 documents and things from time periods not at issue in this litigation. Samsung further objects to
20 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any
21 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
22 further objects to the Request as overly burdensome for its use of the overly broad terms “Defined
23 Wireless SSOs” and “Essential IPR” and “Defined Wireless Standards.”

24 Subject to these objections, Samsung will produce relevant, non-privileged documents
25 within its possession, custody, or control, if any, after conducting a reasonable search in
26 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 145:**

2 All documents relating to any decision by Samsung to disclose or not to disclose the
3 existence of allegedly Essential IPR during the standardization process for any Defined Wireless
4 Standard, including but not limited to, Samsung's decision to disclose or not to disclose foreign
5 patents and U.S. and foreign patent applications related to the Samsung Patents-In-Suit during the
6 standardization process for any Defined Wireless Standard.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 145:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
13 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
14 as vague and ambiguous. For example, the term "Samsung's understanding of, and compliance
15 with," is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is
16 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects
17 to the Request as overbroad in that it is not limited to any reasonable time period and seeks
18 documents and things from time periods not at issue in this litigation. Samsung further objects to
19 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any
20 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
21 further objects to the Request as overly burdensome for its use of the overly broad definition of
22 "Defined Wireless Standards." Samsung further objects to the Request as duplicative of Apple's
23 Request For Production Nos. 146 and 147.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents
25 within its possession, custody, or control, if any, after conducting a reasonable search in
26 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 146:**

2 All documents relating to or comprising communications, statements, submissions, or
3 presentations by Samsung regarding the IPR disclosure practices, policies, or procedures of any of
4 the Defined Wireless SSOs.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 146:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the
12 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
13 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
14 reasonable time period and seeks documents and things from time periods not at issue in this
15 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
16 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
17 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome
18 for its use of the overly broad term “Defined Wireless SSOs.” Samsung further objects to the
19 Request as duplicative of Apple’s Request For Production Nos. 145 and 147.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents
21 within its possession, custody, or control, if any, after conducting a reasonable search in
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 147:**

24 All documents relating to or comprising any Samsung policy, guidelines, or internal
25 directives regarding Samsung’s understanding or interpretation of and/or compliance with any IPR
26 disclosure practices, policies, or procedures of any of the Defined Wireless SSOs.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 147:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
8 as vague and ambiguous. For example, the term “Samsung’s understanding of, and compliance
9 with,” is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is
10 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects
11 to the Request as overbroad in that it is not limited to any reasonable time period and seeks
12 documents and things from time periods not at issue in this litigation. Samsung further objects to
13 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any
14 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung
15 further objects to the Request as overly burdensome for its use of the overly broad term “Defined
16 Wireless SSOs.” Samsung further objects to the Request as duplicative of Apple’s Request For
17 Production No. 145 and 146.

18 Subject to these objections, Samsung will produce relevant, non-privileged documents
19 within its possession, custody, or control, if any, after conducting a reasonable search in
20 accordance with the Patent Local Rules.

21 **REQUEST FOR PRODUCTION NO. 148:**

22 All documents relating to or comprising communications, statements, submissions, or
23 presentations by Samsung regarding caps or other limits on cumulative royalties for IPR Essential
24 to any Defined Wireless Standards, the determination of a FRAND royalty rate, and/or the effect
25 of standardization on monopoly power in the licensing of IPR Essential to any Defined Wireless
26 Standards.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 148:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the
8 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
9 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
10 reasonable time period and seeks documents and things from time periods not at issue in this
11 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly
12 broad terms “Defined Wireless Standards” and “IPR Essential to any Defined Wireless
13 Standards.” Samsung further objects to the Request to the extent it seeks documents that are not
14 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
15 discovery of admissible evidence.

16 Subject to these objections, Samsung will produce relevant, non-privileged documents
17 within its possession, custody, or control, if any, after conducting a reasonable search in
18 accordance with the Patent Local Rules.

19 **REQUEST FOR PRODUCTION NO. 149:**

20 All documents relating to actual or potential competition between Samsung and any person
21 or company that designs or sells Mobile Wireless Telecommunications Devices complying,
22 conforming with, or using any of the Defined Wireless Standards. This request includes, but is not
23 limited to:

24 (a) documents relating to actual or potential market shares of Mobile Wireless
25 Telecommunications Devices;

26 (b) documents relating to the competitive position or relative strengths and weaknesses
27 of Samsung’s Mobile Wireless Telecommunications Devices and/or any other competing Mobile
28 Wireless Telecommunications Devices;

1 (c) documents relating to product and/or technology comparisons between Samsung
2 and any of its actual or potential competitors offering Mobile Wireless Telecommunications
3 Devices;

4 (d) documents relating to or comprising actual or projected numbers of customers or
5 revenues from the sale of Mobile Wireless Telecommunications Devices by Samsung or any of its
6 actual or potential competitors;

7 (e) documents relating to or comprising an analysis of actual or potential competition
8 for improvements or innovations in features, functions, ease of operation, performance, cost, or
9 other advantages to customers or users of Mobile Wireless Telecommunications Devices; and

10 (f) documents relating to or comprising policies and strategies for responding to new
11 entrants in the sale of Mobile Wireless Telecommunications Devices, including mobile wireless
12 handsets complying, conforming with, or using any of the Defined Wireless Standards.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 149:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
19 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
20 as vague and ambiguous. For example, the term “actual or potential competition between
21 Samsung and any person or company” is vague and ambiguous. Samsung further objects to the
22 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it
23 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any
24 reasonable time period and seeks documents and things from time periods not at issue in this
25 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
26 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
27 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome
28 for its use of the overly broad definition of “Defined Wireless Standards.” Samsung further

1 objects to the Request to the extent it seeks documents that are not within the possession, custody,
2 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents
3 equally or more readily available to Apple than to Samsung. Samsung further objects to the
4 Request to the extent the requested documents are publicly available. Samsung further objects to
5 the Request to the extent it seeks documents containing confidential third party information,
6 including information subject to a non-disclosure or other agreement between Samsung and a third
7 party.

8 Subject to these objections, Samsung is willing to meet and confer with Apple about the
9 relevance and scope of the information sought by this request.

10 **REQUEST FOR PRODUCTION NO. 150:**

11 All documents relating to actual or potential competition between Samsung and Apple.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 150:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
17 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
18 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
19 as vague and ambiguous. For example, the term “actual or potential competition” is vague and
20 ambiguous. Samsung further objects to the Request as overbroad in that it seeks documents and
21 things that pertain to products not at issue in this litigation. Samsung further objects to the
22 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
23 and things from time periods not at issue in this litigation. Samsung further objects to the Request
24 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
25 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
26 objects to the Request to the extent it seeks documents that are not within the possession, custody,
27 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents
28 equally or more readily available to Apple than to Samsung. Samsung further objects to the

1 Request to the extent the requested documents are publicly available. Samsung further objects to
2 the Request to the extent it seeks documents containing confidential third party information,
3 including information subject to a non-disclosure or other agreement between Samsung and a third
4 party.

5 Subject to these objections, Samsung is willing to meet and confer with Apple about the
6 relevance and scope of the information sought by this request.

7 **REQUEST FOR PRODUCTION NO. 151:**

8 All documents relating to actual or potential litigation or arbitration threatened or filed by
9 or against Samsung, including but not limited to *In re Certain 3G WCDMA Handsets (InterDigital*
10 *v. Samsung)*, No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson*
11 *v. Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re*
12 *Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct. San
13 Francisco), regarding the licensing of any IPR related to the Defined Wireless Standards,
14 including without limitation any and all expert reports and court filings, and transcripts of any
15 deposition, hearing, or other recorded or transcribed proceeding in the arbitrations or litigations.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 151:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
21 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
22 burdensome, and/or would require undue expense to answer. Samsung further objects the Request
23 as vague and ambiguous. For example, the term “potential litigation or arbitration” is vague and
24 ambiguous. Samsung further objects to the Request as overbroad in that it is not limited to any
25 reasonable time period and seeks documents and things from time periods not at issue in this
26 litigation. Samsung further objects to the Request to the extent it seeks documents that are not
27 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
28 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome

1 for its use of the overly broad definition of “Defined Wireless Standards.” Samsung further
2 objects to the Request to the extent it seeks documents that are not within the possession, custody,
3 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents
4 equally or more readily available to Apple than to Samsung. Samsung further objects to the
5 Request to the extent the requested documents are publicly available. Samsung further objects to
6 the Request to the extent it seeks documents subject to a protective order or under seal.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 152:**

10 All documents relating to or containing any claims or statements by Samsung in any
11 litigation or judicial proceeding, including but not limited to *In re Certain 3G WCDMA Handsets*
12 (*InterDigital v. Samsung*), No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D.
13 Del.); *Ericsson v. Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D.
14 Cal.); *In re Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct.
15 San Francisco), regarding the licensing of IPR that is claimed Essential to any Defined Wireless
16 Standard, the determination of a: FRAND royalty rate for any IPR that is claimed Essential to any
17 Defined Wireless Standard, and the propriety of injunctive relief for the infringement of IPR
18 claimed to be Essential to any Defined Wireless Standard.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 152:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the
26 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
27 and things from time periods not at issue in this litigation. Samsung further objects to the Request
28 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or

1 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
2 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined
3 Wireless Standards.” Samsung further objects to the Request to the extent it seeks documents that
4 are not within the possession, custody, or control of Samsung. Samsung further objects to the
5 Request to the extent it seeks documents equally or more readily available to Apple than to
6 Samsung. Samsung further objects to the Request to the extent the requested documents are
7 publicly available. Samsung further objects to the Request to the extent it seeks documents
8 subject to a protective order or under seal.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 153:**

12 All transcripts of depositions or other documents containing any testimony and or
13 statements by Samsung, former Samsung affiliates or employees, or experts retained by Samsung
14 or counsel to Samsung, relating to any litigation or judicial proceeding, including but not limited
15 to *In re Certain 3G WCDMA Handsets (InterDigital v. Samsung)*, No. 337-TA-601 (I.T.C.);
16 *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson v. Samsung*, No. 06-0063 (E.D. Tex.);
17 *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re Rambus*, No. 9302 (F.T.C.); and *Rambus v.*
18 *Micron*, No. 04-431105 (Cal. Super. Ct. San Francisco), concerning IPR claimed Essential to any
19 Defined Wireless Standard, the determination of a FRAND royalty rate for any IPR allegedly
20 Essential to a Defined Wireless Standard, and the propriety of injunctive relief for the
21 infringement of IPR claimed to be Essential to any Defined Wireless Standard.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 153:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
28 burdensome, and/or would require undue expense to answer. Samsung further objects to the

1 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
2 and things from time periods not at issue in this litigation. Samsung further objects to the Request
3 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
4 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
5 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined
6 Wireless Standards.” Samsung further objects to the Request as duplicative of Apple’s Request
7 For Production No. 152. Samsung further objects to the Request to the extent it seeks documents
8 that are not within the possession, custody, or control of Samsung. Samsung further objects to the
9 Request to the extent it seeks documents equally or more readily available to Apple than to
10 Samsung. Samsung further objects to the Request to the extent the requested documents are
11 publicly available. Samsung further objects to the Request to the extent it seeks documents
12 subject to a protective order or under seal.

13 Subject to these objections, Samsung is willing to meet and confer with Apple about the
14 relevance and scope of the information sought by this request.

15 **REQUEST FOR PRODUCTION NO. 154:**

16 All documents prepared by any expert, including any technical, economic, marketing or
17 licensing experts, retained by Samsung or by counsel to Samsung for any litigation or judicial
18 proceeding, including but not limited to *In re Certain 3G WCDMA Handsets (InterDigital v.*
19 *Samsung)*, No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson v.*
20 *Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re*
21 *Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct. San
22 Francisco), concerning IPR claimed Essential to any Defined Wireless Standard, the determination
23 of a FRAND royalty rate for any IPR allegedly Essential to a Defined Wireless Standard, and the
24 propriety of injunctive relief for the infringement of IPR claimed to be Essential to any Defined
25 Wireless Standard.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 154:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the
5 Request as overbroad in that it is not limited to any reasonable time period and seeks documents
6 and things from time periods not at issue in this litigation. Samsung further objects to the Request
7 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or
8 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further
9 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined
10 Wireless Standards.” Samsung further objects to the Request as duplicative of Apple’s Request
11 For Production Nos. 152 and 153. Samsung further objects to the Request to the extent it seeks
12 documents that are not within the possession, custody, or control of Samsung. Samsung further
13 objects to the Request to the extent it seeks documents equally or more readily available to Apple
14 than to Samsung. Samsung further objects to the Request to the extent the requested documents
15 are publicly available. Samsung further objects to the Request to the extent it seeks documents
16 subject to a protective order or under seal.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 155:**

20 All documents relating to any Samsung policy or practice for compliance with any federal
21 or state antitrust, unfair competition, or unfair trade practices law.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 155:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly
28 burdensome, and/or would require undue expense to answer. Samsung further objects the Request

1 as vague and ambiguous. For example, the term “compliance” is vague and ambiguous. Samsung
2 further objects to the Request as overbroad in that it seeks documents and things that pertain to
3 products not at issue in this litigation. Samsung further objects to the Request as overbroad in that
4 it seeks documents and things that bear on occurrences in other countries that are not at issue in
5 this litigation. Samsung further objects to the Request as overbroad in that it is not limited to any
6 reasonable time period and seeks documents and things from time periods not at issue in this
7 litigation.

8 Subject to these objections, Samsung is willing to meet and confer with Apple about the
9 relevance and scope of the information sought by this request.

10
11 DATED: September 8, 2011

Respectfully submitted,

12
13 QUINN EMANUEL URQUHART &
14 SULLIVAN, LLP

15 By /s/ Victoria Maroulis

16 Charles K. Verhoeven

17 Kevin P.B. Johnson

18 Victoria F. Maroulis

19 Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,

20 LTD., SAMSUNG ELECTRONICS AMERICA,

INC. and SAMSUNG

21 TELECOMMUNICATIONS AMERICA, LLC
22
23
24
25
26
27
28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on Sept. 8, 2011, I caused **SAMSUNG'S OBJECTIONS AND**
3 **RESPONSES TO APPLE, INC.'S THIRD SET OF REQUESTS FOR PRODUCTION OF**
4 **DOCUMENTS AND THINGS (NOS. 53-155)** to be electronically served on the following via
5 email:

6 **ATTORNEYS FOR APPLE INC.**

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25
26 I declare under penalty of perjury that the foregoing is true and correct. Executed in
27 Redwood Shores, California on Sept. 8, 2011.

28 /s/ Melissa N. Chan