

EXHIBIT C

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

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S FIRST SET OF REQUESTS
FOR ADMISSION TO APPLE INC.**

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1 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants and
2 Counterclaimants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and
3 Samsung Telecommunications America, LLC (collectively “Samsung”) propound the following
4 requests for admission on Plaintiff and Counterclaim Defendant Apple Inc. (“Apple”). Apple
5 shall admit or deny the following statements, and serve those responses on Defendants’ counsel,
6 Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin Dolphin Drive, 5th Floor, Redwood Shores,
7 California 94065, within 30 days, or such other time as the parties agree or the Court orders.
8 These requests for admission are continuing in nature and Apple must timely supplement the
9 answers to them under Fed. R. Civ. P. 26(e) whenever an answer is in some material respect
10 incomplete or incorrect.

11 **DEFINITIONS**

12 The requests for production, as well as the Instructions provided above, are subject to and
13 incorporate the following definitions and instructions as used herein:

14 1. The terms “APPLE,” “PLAINTIFF,” “YOU,” and “YOUR” shall refer to Apple,
15 Inc., any predecessor or successor of Apple, Inc., and any past or present parent, division,
16 subsidiary, affiliate, joint venture, associated organization, director, officer, agent, employee,
17 consultant, staff member, or other representative of Apple, Inc., including counsel and patent
18 agents, in any country.

19 2. The term “DEFENDANTS” and “SAMSUNG” means Samsung Electronics Co.,
20 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

21 3. The term “APPLE ACCUSED PRODUCTS” shall mean electronic devices that
22 allow for communications and data transfer over networks including establishing data
23 connections, execution of user operations and audio play back of digital data that are
24 manufactured, distributed, and/or sold by You or Your parent, subsidiary, or affiliate companies or
25 on Your behalf, or on behalf of Your parent, subsidiary, or affiliate companies anywhere in the
26 world, at any time between April 15, 2005 through the pendency of This Lawsuit, including each
27 and every Apple product that Samsung has identified as infringing in any of its complaints or
28 infringement contentions served in this action. The term shall include, without limitation, the

1 following devices: the Apple iPhone, the Apple iPhone 3G, the Apple iPhone 3GS, the Apple
2 iPhone 4, the iPod Touch, the iPad, the iPad 3G, the iPad 2, the iPad 2 3G.

3 4. The term “Software” shall include source code, hardware code, machine code,
4 assembly code, or code written in any programming language, and code that can be compiled or
5 acted upon by a processor, any listings or printouts thereof, and any release notes describing the
6 features or modifications of such code.

7 5. The term “Executable Software” shall mean computer files containing encoded
8 instructions capable of being executed by a processing unit (e.g. central processing unit, micro-
9 controller), and any release notes describing the features or modifications of such files. The term
10 shall include, without limitation, firmware and executable binary files.

11 6. The term “Hardware” includes all constituent parts of a device including, but not
12 limited to, assemblies, subassemblies, modules, individual integrated circuits, chipset, chipsets,
13 software, hardware-based capabilities, and/or application specific integrated circuits.

14 7. The term “Baseband Processor” shall mean a processor in a mobile
15 telecommunications device that is mainly used to process communication functions.

16 8. The term “3GPP” shall mean the organization known as the 3rd Generation
17 Partnership Project which specifies, develops, and promulgates technical specifications for
18 wireless networks.

19 9. The term “person” or “persons” refers to any individual, corporation,
20 proprietorship, association, joint venture, company, partnership or other business or legal entity,
21 including governmental bodies and agencies. The masculine includes the feminine and vice versa;
22 the singular includes the plural and vice versa.

23 10. The terms “any,” “all,” “every,” and “each” shall each mean and include the other
24 as necessary to bring within the scope of these requests for production all responses that might
25 otherwise be construed to be outside of their scope.

26 11. The terms “and,” “or,” and “and/or” shall be construed either disjunctively or
27 conjunctively as necessary to bring within the scope of these requests for production all responses
28 that might otherwise be construed to be outside of its scope.

1 **REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1:**

3 Admit that the Baseband Processors in each APPLE ACCUSED PRODUCT use 16QAM
4 modulation.

5 **REQUEST FOR ADMISSION NO. 2:**

6 Admit that the Baseband Processors in the Apple iPhone use 16QAM modulation.

7 **REQUEST FOR ADMISSION NO. 3:**

8 Admit that the Baseband Processors in the Apple iPhone 3G use 16QAM modulation.

9 **REQUEST FOR ADMISSION NO. 4:**

10 Admit that the Baseband Processors in the Apple iPhone 3GS use 16QAM modulation.

11 **REQUEST FOR ADMISSION NO. 5:**

12 Admit that the Baseband Processors in the Apple iPhone 4 use 16QAM modulation.

13 **REQUEST FOR ADMISSION NO. 6:**

14 Admit that the Baseband Processors in the iPod Touch use 16QAM modulation.

15 **REQUEST FOR ADMISSION NO. 7:**

16 Admit that the Baseband Processors in the iPad use 16QAM modulation.

17 **REQUEST FOR ADMISSION NO. 8:**

18 Admit that the Baseband Processors in the iPad 3G use 16QAM modulation.

19 **REQUEST FOR ADMISSION NO. 9:**

20 Admit that the Baseband Processors in the iPad 2 use 16QAM modulation.

21 **REQUEST FOR ADMISSION NO. 10:**

22 Admit that the Baseband Processors in the iPad 2 3G use 16QAM modulation.

23 **REQUEST FOR ADMISSION NO. 11:**

24 Admit that the Apple iPhone 3G incorporates the following Baseband Processor: Infineon
25 PMB 8878 (X-GOLD 608).

26 **REQUEST FOR ADMISSION NO. 12:**

27 Admit that the Apple iPhone 3G is compliant with 3GPP Technical Specification 25.212
28 v.6.0.0.

1 **REQUEST FOR ADMISSION NO. 13:**

2 Admit that the Baseband Processor used in Apple iPhone 3G is compliant with 3GPP
3 Technical Specification 25.212 v.6.0.0.

4 **REQUEST FOR ADMISSION NO. 14:**

5 Admit that the Apple iPhone 3G is compliant with 3GPP Technical Specification 25.212
6 v.5.0.0.

7 **REQUEST FOR ADMISSION NO. 15:**

8 Admit that the Baseband Processor used in Apple iPhone 3G is compliant with 3GPP
9 Technical Specification 25.212 v.5.0.0.

10 **REQUEST FOR ADMISSION NO. 16:**

11 Admit that the Apple iPhone 3GS incorporates the following Baseband Processor:
12 Infineon PMB 8878 (X-GOLD 608).

13 **REQUEST FOR ADMISSION NO. 17:**

14 Admit that the Apple iPhone 3GS is compliant with 3GPP Technical Specification 25.212
15 v.6.0.0.

16 **REQUEST FOR ADMISSION NO. 18:**

17 Admit that the Baseband Processor used in Apple iPhone 3GS is compliant with 3GPP
18 Technical Specification 25.212 v.6.0.0.

19 **REQUEST FOR ADMISSION NO. 19:**

20 Admit that the Apple iPhone 3GS is compliant with 3GPP Technical Specification 25.212
21 v.5.0.0.

22 **REQUEST FOR ADMISSION NO. 20:**

23 Admit that the Baseband Processor used in Apple iPhone 3GS is compliant with 3GPP
24 Technical Specification 25.212 v.5.0.0.

25 **REQUEST FOR ADMISSION NO. 21:**

26 Admit that the Apple iPad 3G incorporates the following Baseband Processor: Infineon
27 PMB 8878 (X-GOLD 608).

28 **REQUEST FOR ADMISSION NO. 22:**

1 Admit that the Apple iPad 3G is compliant with 3GPP Technical Specification 25.212
2 v.6.0.0.

3 **REQUEST FOR ADMISSION NO. 23:**

4 Admit that the Baseband Processor used in Apple iPad 3G is compliant with 3GPP
5 Technical Specification 25.212 v.6.0.0.

6 **REQUEST FOR ADMISSION NO. 24:**

7 Admit that the Apple iPad 3G is compliant with 3GPP Technical Specification 25.212
8 v.5.0.0.

9 **REQUEST FOR ADMISSION NO. 25:**

10 Admit that the Baseband Processor used in Apple iPad 3G is compliant with 3GPP
11 Technical Specification 25.212 v.5.0.0.

12 **REQUEST FOR ADMISSION NO. 26:**

13 Admit that the Apple iPhone 4 incorporates the following Baseband Processor: Infineon
14 (X-GOLD 616)

15 **REQUEST FOR ADMISSION NO. 27:**

16 Admit that the Apple iPhone 4 is compliant with 3GPP Technical Specification 25.212
17 v.6.0.0.

18 **REQUEST FOR ADMISSION NO. 28:**

19 Admit that the Baseband Processor used in Apple iPhone 4 is compliant with 3GPP
20 Technical Specification 25.212 v.6.0.0.

21 **REQUEST FOR ADMISSION NO. 29:**

22 Admit that the Apple iPhone 4 is compliant with 3GPP Technical Specification 25.212
23 v.5.0.0.

24 **REQUEST FOR ADMISSION NO. 30:**

25 Admit that the Baseband Processor used in Apple iPhone 4 is compliant with 3GPP
26 Technical Specification 25.212 v.5.0.0.

27 **REQUEST FOR ADMISSION NO. 31:**

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1 Admit that the Apple iPad 2 incorporates the following Baseband Processor: Infineon (X-
2 GOLD 616)

3 **REQUEST FOR ADMISSION NO. 32:**

4 Admit that the Apple iPad 2 is compliant with 3GPP Technical Specification 25.212
5 v.6.0.0.

6 **REQUEST FOR ADMISSION NO. 33:**

7 Admit that the Baseband Processor used in Apple iPad 2 is compliant with 3GPP
8 Technical Specification 25.212 v.6.0.0.

9 **REQUEST FOR ADMISSION NO. 34:**

10 Admit that the Apple iPad 2 is compliant with 3GPP Technical Specification 25.212
11 v.5.0.0.

12 **REQUEST FOR ADMISSION NO. 35:**

13 Admit that the Baseband Processor used in Apple iPad 2 is compliant with 3GPP
14 Technical Specification 25.212 v.5.0.0.

15 **REQUEST FOR ADMISSION NO. 36:**

16 Admit that Apple has tested the iPhone 3G in the United States for compliance with 3GPP
17 standards.

18 **REQUEST FOR ADMISSION NO. 37:**

19 Admit that Apple has tested the iPhone 3G in the United States for compliance with a
20 3GPP carrier's network.

21 **REQUEST FOR ADMISSION NO. 38:**

22 Admit that a third party has tested the iPhone 3G in the United States for compliance with
23 3GPP standards.

24 **REQUEST FOR ADMISSION NO. 39:**

25 Admit that a third party has tested the iPhone 3G in the United States for compliance with
26 a 3GPP carrier's network.

27 **REQUEST FOR ADMISSION NO. 40:**

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1 Admit that Apple has tested the iPhone 3G S in the United States for compliance with
2 3GPP standards.

3 **REQUEST FOR ADMISSION NO. 41:**

4 Admit that Apple has tested the iPhone 3G S in the United States for compliance with a
5 3GPP carrier's network.

6 **REQUEST FOR ADMISSION NO. 42:**

7 Admit that a third party has tested the iPhone 3G S in the United States for compliance
8 with 3GPP standards.

9 **REQUEST FOR ADMISSION NO. 43:**

10 Admit that a third party has tested the iPhone 3G S in the United States for compliance
11 with a 3GPP carrier's network.

12 **REQUEST FOR ADMISSION NO. 44:**

13 Admit that Apple has tested the iPad 3G in the United States for compliance with 3GPP
14 standards.

15 **REQUEST FOR ADMISSION NO. 45:**

16 Admit that Apple has tested the iPad 3G in the United States for compliance with a 3GPP
17 carrier's network.

18 **REQUEST FOR ADMISSION NO. 46:**

19 Admit that a third party has tested the iPad 3G in the United States for compliance with
20 3GPP standards.

21 **REQUEST FOR ADMISSION NO. 47:**

22 Admit that a third party has tested the iPad 3G in the United States for compliance with a
23 3GPP carrier's network.

24 **REQUEST FOR ADMISSION NO. 48:**

25 Admit that Apple has tested the iPhone 4 in the United States for compliance with 3GPP
26 standards.

27 **REQUEST FOR ADMISSION NO. 49:**

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1 Admit that Apple has tested the iPhone 4 in the United States for compliance with a 3GPP
2 carrier's network.

3 **REQUEST FOR ADMISSION NO. 50:**

4 Admit that a third party has tested the iPhone 4 in the United States for compliance with
5 3GPP standards.

6 **REQUEST FOR ADMISSION NO. 51:**

7 Admit that a third party has tested the iPhone 4 in the United States for compliance with a
8 3GPP carrier's network.

9 **REQUEST FOR ADMISSION NO. 52:**

10 Admit that Apple has tested the iPad 2 in the United States for compliance with 3GPP
11 standards.

12 **REQUEST FOR ADMISSION NO. 53:**

13 Admit that Apple has tested the iPad 2 in the United States for compliance with a 3GPP
14 carrier's network.

15 **REQUEST FOR ADMISSION NO. 54:**

16 Admit that a third party has tested the iPad 2 in the United States for compliance with
17 3GPP standards.

18 **REQUEST FOR ADMISSION NO. 55:**

19 Admit that a third party has tested the iPad 2 in the United States for compliance with a
20 3GPP carrier's network.

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