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 LTD., SAMSUNG ELECTRONICS AMERICA,  
 15 INC. and SAMSUNG  
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17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
 19

20 APPLE INC., a California corporation,  
 21 Plaintiff,  
 22 vs.  
 23 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 24 ELECTRONICS AMERICA, INC., a New  
 York corporation; SAMSUNG  
 25 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,  
 26 Defendant.  
 27

CASE NO. 11-cv-01846-LHK

1 **DEFENDANT SAMSUNG'S NOTICE OF CORRECTION TO SAMSUNG'S MOTION TO**  
2 **COMPEL PRODUCTION OF DOCUMENTS AND THINGS**

3  
4 Defendant Samsung respectfully submits the following corrections to Samsung's Motion  
5 to Compel the Production of Documents and Things.

6  
7 First, Samsung wishes to replace the omitted text on page 38, with:

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 252:**

9 Apple objects to this request as overly broad, unduly burdensome, and not reasonably  
10 calculated to lead to the discovery of admissible evidence.

11 Subject to and without waiving the foregoing General and Specific Objections, Apple has  
12 produced or will produce responsive, non-privileged documents in its possession, custody, or  
13 control, if any, located after a reasonable search, sufficient to show U.S. sales of accused products  
14 over the relevant time period, including information related to revenue and profitability.

15  
16 Second, Samsung wishes to replace the omitted text on page 39, with:

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 253:**

18 Apple objects to this request as overly broad, unduly burdensome, and not reasonably  
19 calculated to lead to the discovery of admissible evidence.

20 Subject to and without waiving the foregoing General and Specific Objections, Apple has  
21 produced or will produce responsive, non-privileged documents in its possession, custody, or  
22 control, if any, located after a reasonable search, sufficient to show U.S. sales of accused products  
23 over the relevant time period, including information related to revenue and profitability.

24  
25 Third, Samsung wishes to replace the omitted text on page 39, with:

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 254:**

27 Apple objects to this request as overly broad, unduly burdensome, and not reasonably  
28 calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving the foregoing General and Specific Objections, Apple has  
2 produced or will produce responsive, non-privileged documents in its possession, custody, or  
3 control, if any, located after a reasonable search, sufficient to show U.S. sales of accused products  
4 over the relevant time period, including information related to revenue and profitability.

5  
6 Samsung did not realize this error until after its Motion to Compel had been filed.

7  
8 DATED: January 11, 2012

Respectfully submitted,

9 QUINN EMANUEL URQUHART &  
10 SULLIVAN, LLP

11  
12 By/s/ \_\_\_\_\_

13 Charles K. Verhoeven

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15 Victoria F. Maroulis

16 Michael T. Zeller

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18 LTD., SAMSUNG ELECTRONICS AMERICA,  
19 INC. and SAMSUNG

20 TELECOMMUNICATIONS AMERICA, LLC  
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