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13 Attorneys for SAMSUNG ELECTRONICS  
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.  
25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF TODD BRIGGS  
IN SUPPORT OF SAMSUNG'S  
OPPOSITION TO APPLE'S MOTION TO  
STRIKE EVIDENCE**

Date: January 20, 2012

Time: 10:00 a.m.

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 I, Todd Briggs, declare:

2 1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung  
3 Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications  
4 America, LLC (collectively, "Samsung"). I am licensed to practice law in the State of California.  
5 I submit this declaration in support of Samsung's Opposition to Apple's Motion to Strike  
6 Evidence Not Disclosed As Required by Patent Local Rule 4-3(b). I have personal knowledge of  
7 the facts set forth in this declaration and, if called upon as a witness, I could and would testify to  
8 the following facts.

10 2. Attached hereto as Exhibit A is a true and accurate copy of the cover pleading for  
11 Apple's Patent L.R. 4-2 disclosure.

12 3. Attached hereto as Exhibit C is a true and accurate copy of the cover letter for  
13 Samsung's Patent L.R. 4-2 disclosure.

14 4. Attached hereto as Exhibit B is a true and accurate copy of the cover pleading for  
15 the Parties Joint Claim Construction Statement.

17 5. Attached hereto as Exhibit D is a true and accurate copy of correspondence from  
18 Apple's counsel serving Dr. Givargis's declaration in support of Apple's claim construction,  
19 received on November 14, 2011, at 10:17 pm, two hours prior to filing the Parties' Joint Claim  
20 Construction Statement.

21 6. Attached hereto as Exhibit E is a true and accurate copy of the ECF notification  
22 indicating that the Parties filed their Joint Claim Construction Statement on November 14, 2011,  
23 at 11:57 pm.

24 7. Attached hereto as Exhibit F is a true and accurate copy of excerpts from Dr.  
25 Givargis's declaration, served on November 14, 2011, at 10:17 pm.  
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8. Attached hereto as Exhibit G is a true and accurate copy of excerpts from Dr. Givargis's deposition testimony.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Redwood Shores, California on January 12, 2012.

/s/ Todd Briggs

Todd Briggs