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

13   UNITED STATES DISTRICT COURT

14   NORTHERN DISTRICT OF CALIFORNIA

15   SAN JOSE DIVISION

16

17 APPLE INC., a California corporation,   Case No.   11-cv-01846-LHK (PSG)

18   Plaintiff,   **DECLARATION OF MIA MAZZA
                                                IN SUPPORT OF APPLE'S
19   v.   OPPOSITION TO SAMSUNG'S
                                                MOTION TO COMPEL**
20 SAMSUNG ELECTRONICS CO., LTD., A
    Korean business entity; SAMSUNG
21 ELECTRONICS AMERICA, INC., a New York   Date: January 19, 2012
    corporation; SAMSUNG   Time: 10:00 a.m.
22 TELECOMMUNICATIONS AMERICA, LLC, a   Place: Courtroom 5, 4th Floor
    Delaware limited liability company.,   Judge: Hon. Paul S. Grewal
23
                Defendants.
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MAZZA DECL. ISO APPLE'S OPP. TO SAMSUNG'S MOT. TO COMPEL
CASE NO. 11-CV-01846-LHK (PSG)
sf-3094618

1   I, Mia Mazza, declare as follows:

2   1.   I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.

3   ("Apple"). I am licensed to practice law in the State of California. Unless otherwise indicated, I

4   have personal knowledge of the matters stated herein or understand them to be true from

5   members of my litigation team. I make this Declaration in support of Apple's Opposition to

6   Samsung's Motion to Compel Apple to Produce Documents and Things.

7   2.   The parties held their first in-person lead trial counsel meeting on January 5, 2012,

8   to discuss the parties' respective positions on numerous outstanding discovery issues and

9   determine whether those issues could be resolved without court intervention. That same day,

10   before the meeting, Apple sent Samsung a letter setting forth its position on the discovery issues

11   raised by Samsung. That letter is attached as Exhibit B to the Declaration of Jason R. Bartlett in

12   support of Apple's Opposition to Samsung's Motion to Enforce Various Court Orders.

13   3.   At the January 5, 2012 lead trial counsel meeting, Samsung did not raise the issue

14   of documents relating to "business plans and strategies."

15   4.   At the January 5, 2012 lead trial counsel meeting and in follow-up

16   correspondence, the parties mutually agreed to provide deposition dates for all noticed witnesses

17   by January 13, 2012. In accord with that agreement, Apple provided deposition dates for all of

18   the noticed Apple witnesses by January 13, 2012. Attached hereto as Exhibit A is a January 13,

19   2012 email from Samsung's counsel to Apple's counsel regarding deposition dates for Samsung

20   witnesses, with the witnesses' names redacted.

21

22   I declare under penalty of perjury that the foregoing is true and correct. Executed this

23   17th day of January, 2012, at San Francisco, California.

24   */s/ Mia Mazza*
                                                              Mia Mazza
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ATTESTATION OF E-FILED SIGNATURE

2   I, Richard S.J. Hung, am the ECF User whose ID and password are being used to file this

3 Declaration. In compliance with General Order 45, X.B., I hereby attest that Mia Mazza has

4 concurred in this filing.

5 Dated: January 17, 2012   */s/ Richard S.J. Hung*
                                              Richard S.J. Hung
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