

EXHIBIT 2
REDACTED VERSION

SUBJECT TO PROTECTIVE ORDER
CONTAINS CONFIDENTIAL INFORMATION

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*Attorneys for Plaintiff and
Counterclaim-Defendant Apple Inc.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

16 APPLE INC., a California corporation,

17 Plaintiffs,

18 vs.

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

23 Defendants.

Civil Action No. 11-CV-01846-LHK

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

**CONFIDENTIAL UNDER THE
PROTECTIVE ORDER**

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1 SAMSUNG ELECTRONICS CO., LTD., a
2 Korean business entity, SAMSUNG
3 ELECTRONICS AMERICA, INC., a New
4 York corporation, and SAMSUNG
5 TELECOMMUNICATIONS AMERICA,
6 LLC, a Delaware limited liability company, a
7 California corporation,

8 Counterclaim-Plaintiff,

9 v.

10 APPLE INC., a California corporation,

11 Counterclaim-Defendants.

**PLAINTIFF AND COUNTERCLAIM-DEFENDANT APPLE INC.'S
RESPONSES TO SAMSUNG'S
FIRST SET OF REQUESTS FOR ADMISSION (1-55)**

12 Under Rules 26 and 36 of the Federal Rules of Civil Procedure and Local Rule 36, Apple
13 Inc. ("Apple") hereby objects and responds to the First Set of Requests for Admission to Apple
14 Inc. (Nos. 1-55) served by Samsung Electronics Co., Ltd., Samsung Electronic America, Inc. and
15 Samsung Telecommunications America, LLC (collectively, "Samsung") on September 16,
16 2011.

GENERAL OBJECTIONS

17 Apple makes the following general responses and objections ("General Objections") to
18 each definition, instruction, and request for admission propounded in Samsung's First Set of
19 Requests for Admission to Apple Inc. These General Objections are hereby incorporated into
20 each specific response. The assertion of the same, similar or additional objections or partial
21 responses to individual requests does not waive any of Apple's General Objections.

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1 1. Apple objects to Samsung’s definitions of “APPLE,” “PLAINTIFF,” “YOU,” and
2 “YOUR” to the extent they purport to include persons or entities that are separate and distinct
3 from Apple and are not under Apple’s control. “Apple” refers only to Apple Inc.

4 2. Apple objects to Samsung’s Instruction No. 1 because it is vague, ambiguous,
5 overly broad, and unduly burdensome. Apple further objects to this instruction on the ground that
6 it purports to impose upon Apple duties and obligations that are inconsistent with and in excess
7 of those obligations that are imposed by the Federal Rules of Civil Procedure and the Civil Local
8 Rules. Apple further objects to this instruction because it calls for the disclosure of information
9 that is privileged and protected by the work product doctrine.
10

11 3. Apple provides these objections and responses to the best of its current
12 knowledge. Discovery or further investigation may reveal additional or different information
13 warranting amendment of these objections and responses. Apple reserves the right to produce at
14 trial and make reference to any evidence, facts, documents, or information not discovered at this
15 time, omitted through good-faith error, mistake, or oversight, or the relevance of which Apple
16 has not presently identified.
17

18 4. By responding to these requests for admission, Apple does not concede the
19 relevance or materiality of any of the requests for admission or of the subjects to which it refers.
20 Apple’s responses are made subject to, and without waiving any objections as to the competency,
21 relevancy, materiality, privilege, or admissibility of any of the responses, or of the subject matter
22 to which they concern, in any proceeding in this action or in any other proceeding.
23

24 5. Apple objects to any request for admission to the extent that it seeks information
25 that is protected from disclosure by the attorney-client privilege, the attorney work product
26 doctrine, the joint defense or common interest privilege, or any other applicable privilege,
27

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1 doctrine, or discovery immunity. The inadvertent production by Apple of information protected
2 from disclosure by any such privilege, doctrine, or immunity shall not be deemed a waiver by
3 Apple of such privileges or protections. Pursuant to the parties' agreement, to the extent any
4 request for admission calls for the identification of information dated after April 15, 2011 that is
5 protected by such privilege, doctrine, or immunity, such information will not be included on
6 Apple's privilege log.
7

8 6. Apple objects generally to the Requests for Admission to the extent they seek
9 confidential, proprietary, or trade secret information of third parties. Apple will endeavor to
10 work with third parties in order to obtain their consent, if necessary, before providing such
11 information. To the extent a request for admission seeks information of a confidential or
12 proprietary nature to Apple, or to others to whom Apple is under an obligation of confidentiality,
13 Apple will respond pursuant to the terms of the protective order to be entered in this case and
14 subject to notice to third parties, as necessary.
15

16 7. Apple objects to Samsung's definition of "APPLE ACCUSED PRODUCTS" to
17 the extent it is overly broad and unduly burdensome and to the extent it seeks information that is
18 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Apple
19 further objects to Samsung's definition of "Apple Accused Products" to the extent that it requires
20 a legal conclusion. For purposes of responding to these Requests, Apple interprets the term
21 "Apple Accused Products" to mean those products that are specifically identified and accused in
22 Samsung's Patent Local Rule 3-1 Infringement Contentions, served on September 7, 2011.
23

24 8. Apple objects to any request for admission to the extent it is premature and/or to
25 the extent that it: (a) conflicts with the schedule entered by the Court; (b) conflicts with
26 obligations that are imposed by the Federal Rules of Civil Procedure, the Civil Local Rules
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1 and/or the Patent Local Rules of this Court, and/or any other applicable rule; (c) seeks
2 information that is the subject of expert testimony; (d) seeks information and/or responses that
3 are dependent on the Court's construction of the asserted claims of the patents-in-suit; and/or (e)
4 seeks information and/or responses that are dependent on depositions and documents that have
5 not been taken or produced.
6

7 9. Apple objects to each request for admission as overbroad and unduly burdensome
8 to the extent that it calls for information that is neither relevant to the claims or defenses of the
9 parties nor reasonably calculated to lead to the discovery of admissible evidence.

10 10. Apple objects to each request for admission and to Samsung's "Definitions" and
11 "Instructions" to the extent they are vague, ambiguous, overbroad, or unduly burdensome, or
12 purport to impose upon Apple any duty or obligation that is inconsistent with or in excess of
13 those obligations that are imposed by the Federal Rules of Civil Procedure, the Civil Local Rules
14 and/or the Patent Local Rules of this Court, or any other applicable rule.
15

16 11. Apple objects to any Request for Admission to the extent it seeks irrelevant
17 information about Apple's products or business operations. Such requests are overbroad and
18 unduly burdensome. Apple will only produce information that is relevant to the patents-in-suit,
19 or that is otherwise related to the claims or defenses asserted by the parties in this litigation.
20

21 12. Apple objects to each Request for Admission to the extent that it would impose a
22 duty on Apple to undertake a search for or an evaluation of information, documents, or things for
23 which Samsung is equally able to search for and evaluate. In particular, Apple objects to each
24 request for admission to the extent that it seeks information or documents that are publicly
25 available.
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1 13. Apple objects to each Request for Admission to the extent that it seeks
2 information that can be derived or ascertained from documents that will be produced in
3 discovery or that are uniquely in Samsung's possession, custody, and control.

4 14. Apple objects to each Request for Admission to the extent it would require Apple
5 to make a legal conclusion or contention to make a proper response.

6 15. Apple objects to any Definition, Instruction or Request for Admission to the
7 extent that it purports to require identification of oral communications. Such Definition,
8 Instruction or Request for Admission is overbroad, vague, ambiguous, and unduly burdensome.

9 16. Apple objects to the definition of the terms "referring to," "relating to,"
10 "concerning," or "regarding" as vague, ambiguous, overbroad, and unduly burdensome to the
11 extent that they depart from Apple's own definitions of these terms, as defined in Apple's Third
12 Set of Interrogatories, dated August 3, 2011.

13 17. Apple objects to the definition of the term "3GPP" as vague, ambiguous,
14 overbroad and unduly burdensome to the extent it departs from Apple's own definition of this
15 term, as defined in Apple's Third Set of Requests for Production of Documents.

16 18. Apple objects to the definition of "Software" as overly broad, vague, ambiguous,
17 and unduly burdensome, especially with regards to the term "listings." Apple further objects
18 because much of the uncompiled "hardware code, machine code, assembly code" for hardware
19 provided by third parties is not within Apple's possession, custody or control.

20 19. Apple objects to the definition of "Executable Software" as overly broad, vague,
21 ambiguous, and unduly burdensome, especially with regards to the phrase "any release notes."
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1 20. Apple objects to the definition of “Hardware” as overly broad, vague,
2 ambiguous, and unduly burdensome, especially with regards to the term “hardware-based
3 capabilities.”

4 21. Apple objects to the definition of “Baseband Processor” because it is inaccurate,
5 overly broad, vague, ambiguous, and unduly burdensome, especially with regards to the phrase
6 “mainly used to process communication functions.”

7 22. Apple objects to the Requests for Admission to the extent that they purport to
8 define words or phrases to have a meaning different from their commonly understood meaning,
9 or to include more than their commonly understood definitions,
10

11 23. In Apple’s objections, the terms “and” and “or” are intended to be construed
12 conjunctively or disjunctively as necessary to make the objections inclusive rather than
13 exclusive.
14

15 24. Apple objects to the Requests for Admission to the extent they purport to require
16 Apple to identify or describe or identify “every,” “each,” “any,” or other similarly expansive,
17 infinite, or all-inclusive terms to the extent that such requests are overly broad and unduly
18 burdensome.
19

20 25. Apple objects to the Requests for Admission to the extent they seek information
21 that is not in the possession, custody, or control of Apple, purport to require Apple to speculate
22 about the identity of persons who might have responsive documents, and/or purport to call for
23 any description of documents that Apple no longer possesses and/or was under no obligation to
24 maintain.
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26 26. Apple objects to the Requests for Admission to the extent they are not limited in
27 time and seek information for periods of time that are not relevant to any claim or defense.
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1 27. Apple's objections as set forth herein are made without prejudice to Apple's right
2 to assert any additional or supplemental objections pursuant to Rule 26(e).

3 28. Apple will make, and has made, reasonable efforts to respond to Samsung's First
4 Set of Requests for Admission, to the extent that no objection is made, as Apple reasonably
5 understands and interprets each Request for Admission. If Samsung subsequently asserts any
6 interpretation of any Request for Admission that differs from the interpretation of Apple, then
7 Apple reserves the right to supplement and amend its objections and responses.
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10 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION**

11 Subject to the foregoing qualifications and General Objections and the specific objections
12 made below, Apple objects and responds to Samsung Electronics Co. Ltd.'s First Set of Requests
13 for Admission to Apple Inc. as follows:

14
15 **REQUEST FOR ADMISSION NO. 1:**

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

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

19 Apple objects to this Request on the grounds that it is overly broad, unduly burdensome,
20 and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it
21 is not limited in time. Apple objects to this Request to the extent it seeks information that is
22 subject to a confidentiality or non-disclosure agreement or governed by a protective order
23 preventing its production, or otherwise seeks confidential, proprietary or trade secret information
24 of third parties. Apple further objects to this Request for Admission to the extent it requires
25 information outside Apple's possession, custody and control, including, for example, information
26 concerning components that Apple has purchased from third parties. **REDACTED**
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1 REDACTED

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 **REQUEST FOR ADMISSION NO. 2**

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 2**

11 Apple objects to this Request on the grounds that it is duplicative of Request for
12 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
13 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
14 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
15 information that is subject to a confidentiality or non-disclosure agreement or governed by a
16 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
17 secret information of third parties. Apple further objects to this Request for Admission to the
18 extent it requires information outside Apple's possession, custody and control, including, for
19 example, information concerning components that Apple has purchased from third parties.

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

26 [REDACTED]

27 [REDACTED]

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REDACTED

REQUEST FOR ADMISSION NO. 3:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Apple objects to this Request on the grounds that it is duplicative of Request for Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple objects to this Request to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement or governed by a protective order preventing its production, or otherwise seeks confidential, proprietary or trade secret information of third parties. Apple further objects to this Request for Admission to the extent it requires information outside Apple's possession, custody and control, including, for example, information concerning components that Apple has purchased from third parties.

REDACTED

REQUEST FOR ADMISSION NO. 4:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Apple objects to this Request on the grounds that it is duplicative of Request for Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple objects to this Request to the extent it seeks

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1 information that is subject to a confidentiality or non-disclosure agreement or governed by a
2 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
3 secret information of third parties. Apple further objects to this Request for Admission to the
4 extent it requires information outside Apple's possession, custody and control, including, for
5 example, information concerning components that Apple has purchased from third parties.
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7 **REDACTED**

8 **REDACTED**

9 **REDACTED**

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

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

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Apple objects to this Request on the grounds that it is duplicative of Request for
14 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
15 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
16 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
17 information that is subject to a confidentiality or non-disclosure agreement or governed by a
18 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
19 secret information of third parties. Apple further objects to this Request for Admission to the
20 extent it requires information outside Apple's possession, custody and control, including, for
21 example, information concerning components that Apple has purchased from third parties.
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24 **REDACTED**

25 **REDACTED**

26 **REDACTED**

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

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

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

4 Apple objects to this Request on the grounds that it is duplicative of Request for
5 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
6 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
7 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
8 information that is subject to a confidentiality or non-disclosure agreement or governed by a
9 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
10 secret information of third parties. Apple further objects to this Request for Admission to the
11 extent it requires information outside Apple's possession, custody and control, including, for
12 example, information concerning components that Apple has purchased from third parties.
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15 **REDACTED**

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21
22 **REQUEST FOR ADMISSION NO. 7:**

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

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

25 Apple objects to this Request on the grounds that it is duplicative of Request for
26 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
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1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
2 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
3 information that is subject to a confidentiality or non-disclosure agreement or governed by a
4 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
5 secret information of third parties. Apple further objects to this Request for Admission to the
6 extent it requires information outside Apple's possession, custody and control, including, for
7 example, information concerning components that Apple has purchased from third parties.
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9 REDACTED

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

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

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

19 Apple objects to this Request on the grounds that it is duplicative of Request for
20 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
21 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
22 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
23 information that is subject to a confidentiality or non-disclosure agreement or governed by a
24 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
25 secret information of third parties. Apple further objects to this Request for Admission to the
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1 extent it requires information outside Apple’s possession, custody and control, including, for
2 example, information concerning components that Apple has purchased from third parties.

3 **REDACTED**
4 **REDACTED**
5 **REDACTED**
6 **REDACTED**.

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

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

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

10 Apple objects to this Request on the grounds that it is duplicative of Request for
11 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
12 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
13 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
14 information that is subject to a confidentiality or non-disclosure agreement or governed by a
15 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
16 secret information of third parties. Apple further objects to this Request for Admission to the
17 extent it requires information outside Apple’s possession, custody and control, including, for
18 example, information concerning components that Apple has purchased from third parties.

19 **REDACTED**
20 **REDACTED**
21 **REDACTED**
22 **REDACTED**
23 **REDACTED**
24 **REDACTED**
25 **REDACTED**
26 **REDACTED**
27 **REDACTED**

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

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

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

4 Apple objects to this Request on the grounds that it is duplicative of Request for
5 Admission No. 1. Apple objects to this Request on the grounds that it is overly broad, unduly
6 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
7 extent that it is not limited in time. Apple objects to this Request to the extent it seeks
8 information that is subject to a confidentiality or non-disclosure agreement or governed by a
9 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
10 secret information of third parties. Apple further objects to this Request for Admission to the
11 extent it requires information outside Apple's possession, custody and control, including, for
12 example, information concerning components that Apple has purchased from third parties.
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15 **REDACTED**

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

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

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

22 Apple objects to this Request on the grounds that it is overly broad, unduly burdensome,
23 and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it
24 is not limited in time. Apple objects to this Request to the extent it seeks information that is
25 subject to a confidentiality or non-disclosure agreement or governed by a protective order
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1 preventing its production, or otherwise seeks confidential, proprietary or trade secret information
2 of third parties.

3 **REDACTED**

4 **REDACTED**

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

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

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

9 Apple objects to this Request on the grounds that the term “compliant” is vague and
10 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
11 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
12 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
13 information that is subject to a confidentiality or non-disclosure agreement or governed by a
14 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
15 secret information of third parties. Apple further objects to this Request for Admission to the
16 extent it requires information outside Apple’s possession, custody and control, including, for
17 example, information concerning components that Apple has purchased from third parties.

18 **REDACTED**

19 **REDACTED**

20 **REDACTED**

21 **REDACTED**

22 **REDACTED**

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

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

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

2 Apple objects to this Request on the grounds that the term “compliant” is vague and
3 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
4 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
5 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
6 information that is subject to a confidentiality or non-disclosure agreement or governed by a
7 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
8 secret information of third parties. Apple further objects to this Request for Admission to the
9 extent it requires information outside Apple’s possession, custody and control, including, for
10 example, information concerning components that Apple has purchased from third parties.
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12 **REDACTED**
13 **REDACTED**
14 **REDACTED**
15 **REDACTED**

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

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

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

20 Apple objects to this Request on the grounds that the term “compliant” is vague and
21 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
22 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
23 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
24 information that is subject to a confidentiality or non-disclosure agreement or governed by a
25 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
26 secret information of third parties. Apple further objects to this Request for Admission to the
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1 extent it requires information outside Apple’s possession, custody and control, including, for
2 example, information concerning components that Apple has purchased from third parties.

3 **REDACTED**

4 **REDACTED**

5 **REDACTED**

6 **REDACTED**

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 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

11 Apple objects to this Request on the grounds that the term “compliant” is vague and
12 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
13 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
14 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
15 information that is subject to a confidentiality or non-disclosure agreement or governed by a
16 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
17 secret information of third parties. Apple further objects to this Request for Admission to the
18 extent it requires information outside Apple’s possession, custody and control, including, for
19 example, information concerning components that Apple has purchased from third parties.

20 **REDACTED**

21 **REDACTED**

22 **REDACTED**

23 **REDACTED**

24 **REDACTED**

25 **REQUEST FOR ADMISSION NO. 16**

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

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 16**

2 Apple objects to this Request on the grounds that it is overly broad, unduly burdensome,
3 and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it
4 is not limited in time. Apple objects to this Request to the extent it seeks information that is
5 subject to a confidentiality or non-disclosure agreement or governed by a protective order
6 preventing its production, or otherwise seeks confidential, proprietary or trade secret information
7 of third parties.
8

9 **REDACTED**

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

12 Admit that the Apple iPhone 3GS is compliant with 3GPP Technical Specification
13 25.212 v.6.0.0.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

15 Apple objects to this Request on the grounds that the term “compliant” is vague and
16 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
17 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
18 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
19 information that is subject to a confidentiality or non-disclosure agreement or governed by a
20 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
21 secret information of third parties. Apple further objects to this Request for Admission to the
22 extent it requires information outside Apple’s possession, custody and control, including, for
23 example, information concerning components that Apple has purchased from third parties.
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25
26 **REDACTED**
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**SUBJECT TO PROTECTIVE ORDER
CONTAINS CONFIDENTIAL INFORMATION**

1 REDACTED

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

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

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

7 Apple objects to this Request on the grounds that the term “compliant” is vague and
8 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
9 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
10 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
11 information that is subject to a confidentiality or non-disclosure agreement or governed by a
12 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
13 secret information of third parties. Apple further objects to this Request for Admission to the
14 extent it requires information outside Apple’s possession, custody and control, including, for
15 example, information concerning components that Apple has purchased from third parties.
16
17

18 REDACTED

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

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

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

25 Apple objects to this Request on the grounds that the term “compliant” is vague and
26 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
27

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1 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
2 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
3 information that is subject to a confidentiality or non-disclosure agreement or governed by a
4 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
5 secret information of third parties. Apple further objects to this Request for Admission to the
6 extent it requires information outside Apple’s possession, custody and control, including, for
7 example, information concerning components that Apple has purchased from third parties.
8

9 **REDACTED**

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12
13 **REQUEST FOR ADMISSION NO. 20:**

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

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

17 Apple objects to this Request on the grounds that the term “compliant” is vague and
18 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
19 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
20 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
21 information that is subject to a confidentiality or non-disclosure agreement or governed by a
22 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
23 secret information of third parties. Apple further objects to this Request for Admission to the
24 extent it requires information outside Apple’s possession, custody and control, including, for
25 example, information concerning components that Apple has purchased from third parties.
26

27 **REDACTED**

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1 REDACTED

2
3 **REQUEST FOR ADMISSION NO. 21:**

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

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

7 Apple objects to this Request on the grounds that it is overly broad, unduly burdensome,
8 and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it
9 is not limited in time. Apple objects to this Request to the extent it seeks information that is
10 subject to a confidentiality or non-disclosure agreement or governed by a protective order
11 preventing its production, or otherwise seeks confidential, proprietary or trade secret information
12 of third parties.
13

14 REDACTED

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

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

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

21 Apple objects to this Request on the grounds that the term “compliant” is vague and
22 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
23 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
24 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
25 information that is subject to a confidentiality or non-disclosure agreement or governed by a
26 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
27

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1 secret information of third parties. Apple further objects to this Request for Admission to the
2 extent it requires information outside Apple’s possession, custody and control, including, for
3 example, information concerning components that Apple has purchased from third parties.

4 **REDACTED**
5 **REDACTED**
6 **REDACTED**
7 **REDACTED**

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

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

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

12 Apple objects to this Request on the grounds that the term “compliant” is vague and
13 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
14 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
15 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
16 information that is subject to a confidentiality or non-disclosure agreement or governed by a
17 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
18 secret information of third parties. Apple further objects to this Request for Admission to the
19 extent it requires information outside Apple’s possession, custody and control, including, for
20 example, information concerning components that Apple has purchased from third parties.

21 **REDACTED**
22 **REDACTED**
23 **REDACTED**
24 **REDACTED**
25 **REDACTED**

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

5 Apple objects to this Request on the grounds that the term “compliant” is vague and
6 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
7 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
8 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
9 information that is subject to a confidentiality or non-disclosure agreement or governed by a
10 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
11 secret information of third parties. Apple further objects to this Request for Admission to the
12 extent it requires information outside Apple’s possession, custody and control, including, for
13 example, information concerning components that Apple has purchased from third parties.

14
15 **REDACTED**
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19 **REQUEST FOR ADMISSION NO. 25:**

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

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

23 Apple objects to this Request on the grounds that the term “compliant” is vague and
24 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
25 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
26 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
27

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1 information that is subject to a confidentiality or non-disclosure agreement or governed by a
2 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
3 secret information of third parties. Apple further objects to this Request for Admission to the
4 extent it requires information outside Apple's possession, custody and control, including, for
5 example, information concerning components that Apple has purchased from third parties.
6

7 **REDACTED**

8 **REDACTED**

9 **REDACTED**

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

11 Admit that the Apple iPhone 4 incorporates the following Baseband Processor: Infineon
12 (X-GOLD 616).

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

14 Apple objects to this Request on the grounds that the term "Infineon" is vague and
15 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
16 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
17 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
18 information that is subject to a confidentiality or non-disclosure agreement or governed by a
19 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
20 secret information of third parties.
21

22 **REDACTED**

23 **REDACTED**

24 **REDACTED**

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

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

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

2 Apple objects to this Request on the grounds that the term “compliant” is vague and
3 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
4 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
5 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
6 information that is subject to a confidentiality or non-disclosure agreement or governed by a
7 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
8 secret information of third parties. Apple further objects to this Request for Admission to the
9 extent it requires information outside Apple’s possession, custody and control, including, for
10 example, information concerning components that Apple has purchased from third parties.
11

12 **REDACTED**
13 **REDACTED**
14 **REDACTED**
15 **REDACTED**

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

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

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

20 Apple objects to this Request on the grounds that the term “compliant” is vague and
21 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
22 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
23 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
24 information that is subject to a confidentiality or non-disclosure agreement or governed by a
25 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
26 secret information of third parties. Apple further objects to this Request for Admission to the
27

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1 extent it requires information outside Apple’s possession, custody and control, including, for
2 example, information concerning components that Apple has purchased from third parties.

3 **REDACTED**

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

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

11 Apple objects to this Request on the grounds that the term “compliant” is vague and
12 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
13 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
14 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
15 information that is subject to a confidentiality or non-disclosure agreement or governed by a
16 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
17 secret information of third parties. Apple further objects to this Request for Admission to the
18 extent it requires information outside Apple’s possession, custody and control, including, for
19 example, information concerning components that Apple has purchased from third parties.

20
21 **REDACTED**

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

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

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

2 Apple objects to this Request on the grounds that the term “compliant” is vague and
3 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
4 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
5 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
6 information that is subject to a confidentiality or non-disclosure agreement or governed by a
7 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
8 secret information of third parties. Apple further objects to this Request for Admission to the
9 extent it requires information outside Apple’s possession, custody and control, including, for
10 example, information concerning components that Apple has purchased from third parties.
11

12
13 **REDACTED**

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15
16 **REQUEST FOR ADMISSION NO. 31:**

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

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

20 Apple objects to this Request on the grounds that the term “Infineon” is vague and
21 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
22 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
23 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
24 information that is subject to a confidentiality or non-disclosure agreement or governed by a
25 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
26 secret information of third parties.
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REDACTED

REQUEST FOR ADMISSION NO. 32:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Apple objects to this Request on the grounds that the term “compliant” is vague and ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement or governed by a protective order preventing its production, or otherwise seeks confidential, proprietary or trade secret information of third parties. Apple further objects to this Request for Admission to the extent it requires information outside Apple’s possession, custody and control, including, for example, information concerning components that Apple has purchased from third parties.

REDACTED

REQUEST FOR ADMISSION NO. 33:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Apple objects to this Request on the grounds that the term “compliant” is vague and ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement or governed by a

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1 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
2 secret information of third parties. Apple further objects to this Request for Admission to the
3 extent it requires information outside Apple’s possession, custody and control, including, for
4 example, information concerning components that Apple has purchased from third parties.
5

6 **REDACTED**

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

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

11 Apple objects to this Request on the grounds that the term “compliant” is vague and
12 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
13 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
14 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
15 information that is subject to a confidentiality or non-disclosure agreement or governed by a
16 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
17 secret information of third parties. Apple further objects to this Request for Admission to the
18 extent it requires information outside Apple’s possession, custody and control, including, for
19 example, information concerning components that Apple has purchased from third parties.
20

21 **REDACTED**

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

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

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

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1 Apple objects to this Request on the grounds that the term “compliant” is vague and
2 ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly
3 burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the
4 extent that it is not limited in time. Apple also objects to this Request to the extent it seeks
5 information that is subject to a confidentiality or non-disclosure agreement or governed by a
6 protective order preventing its production, or otherwise seeks confidential, proprietary or trade
7 secret information of third parties. Apple further objects to this Request for Admission to the
8 extent it requires information outside Apple’s possession, custody and control, including, for
9 example, information concerning components that Apple has purchased from third parties.
10

11 **REDACTED**

12
13 **REQUEST FOR ADMISSION NO. 36:**

14 Admit that Apple has tested the iPhone 3G in the United States for compliance with
15 3GPP standards.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

17 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
18 standards” are vague and ambiguous. Apple further objects to this Request on the grounds that it
19 is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of
20 admissible evidence to the extent that it is not limited in time. Apple also objects to this Request
21 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
22 or governed by a protective order preventing its production, or otherwise seeks confidential,
23 proprietary or trade secret information of third parties. Apple further objects to this Request for
24 Admission to the extent it requires information outside Apple’s possession, custody and control,
25 including, for example, information concerning components that Apple has purchased from third
26 parties.
27

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1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4
5 **REQUEST FOR ADMISSION NO. 37:**

6 Admit that Apple has tested the iPhone 3G in the United States for compliance with a
7 3GPP carrier's network.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

9 Apple objects to this Request on the grounds that the terms "compliance" and "3GPP
10 carrier's network" are vague and ambiguous. Apple further objects to this Request on the
11 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
12 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
13 this Request to the extent it seeks information that is subject to a confidentiality or non-
14 disclosure agreement or governed by a protective order preventing its production, or otherwise
15 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
16 to this Request for Admission to the extent it requires information outside Apple's possession,
17 custody and control, including, for example, information concerning components that Apple has
18 purchased from third parties.

19
20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23
24 **REQUEST FOR ADMISSION NO. 38:**

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

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

2 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
3 standards” are vague and ambiguous. Apple further objects to this Request that the phrase “a
4 third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the
5 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
6 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
7 this Request to the extent it seeks information that is subject to a confidentiality or non-
8 disclosure agreement or governed by a protective order preventing its production, or otherwise
9 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
10 to this Request for Admission to the extent it requires information outside Apple’s possession,
11 custody and control, including, for example, information concerning components that Apple has
12 purchased from third parties.
13

14
15 **REDACTED**

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

21 Admit that a third party has tested the iPhone 3G in the United States for compliance with
22 a 3GPP carrier’s network.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

24 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
25 carrier’s network” are vague and ambiguous. Apple further objects to this Request that the
26 phrase “a third party” is vague, ambiguous and overly broad. Apple further objects to this
27 Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated
28

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1 to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple
2 also objects to this Request to the extent it seeks information that is subject to a confidentiality or
3 non-disclosure agreement or governed by a protective order preventing its production, or
4 otherwise seeks confidential, proprietary or trade secret information of third parties. Apple
5 further objects to this Request for Admission to the extent it requires information outside Apple's
6 possession, custody and control, including, for example, information concerning components that
7 Apple has purchased from third parties.
8

9 **REDACTED**

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

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

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

18 Apple objects to this Request on the grounds that the terms "compliance" and "3GPP
19 standards" are vague and ambiguous. Apple further objects to this Request on the grounds that it
20 is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of
21 admissible evidence to the extent that it is not limited in time. Apple also objects to this Request
22 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
23 or governed by a protective order preventing its production, or otherwise seeks confidential,
24 proprietary or trade secret information of third parties. Apple further objects to this Request for
25 Admission to the extent it requires information outside Apple's possession, custody and control,
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1 including, for example, information concerning components that Apple has purchased from third
2 parties.

3 **REDACTED**

4 **REDACTED**

5 **REDACTED**

6 **REDACTED**

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

8 Admit that Apple has tested the iPhone 3GS in the United States for compliance with a
9 3GPP carrier's network.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

11 Apple objects to this Request on the grounds that the terms "compliance" and "3GPP
12 carrier's network" are vague and ambiguous. Apple further objects to this Request on the
13 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
14 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
15 this Request to the extent it seeks information that is subject to a confidentiality or non-
16 disclosure agreement or governed by a protective order preventing its production, or otherwise
17 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
18 to this Request for Admission to the extent it requires information outside Apple's possession,
19 custody and control, including, for example, information concerning components that Apple has
20 purchased from third parties.

21 **REDACTED**

22 **REDACTED**

23 **REDACTED**

24 **REDACTED**

25 **REDACTED**

26

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

5 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
6 standards” are vague and ambiguous. Apple further objects to this Request that the phrase “a
7 third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the
8 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
9 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
10 this Request to the extent it seeks information that is subject to a confidentiality or non-
11 disclosure agreement or governed by a protective order preventing its production, or otherwise
12 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
13 to this Request for Admission to the extent it requires information outside Apple’s possession,
14 custody and control, including, for example, information concerning components that Apple has
15 purchased from third parties.
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17

18 **REDACTED**

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

23 Admit that a third party has tested the iPhone 3GS in the United States for compliance
24 with a 3GPP carrier’s network.
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RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Apple objects to this Request on the grounds that the terms “compliance” and “3GPP carrier’s network” are vague and ambiguous. Apple further objects to this Request that the phrase “a third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement or governed by a protective order preventing its production, or otherwise seeks confidential, proprietary or trade secret information of third parties. Apple further objects to this Request for Admission to the extent it requires information outside Apple’s possession, custody and control, including, for example, information concerning components that Apple has purchased from third parties.

REDACTED

REQUEST FOR ADMISSION NO. 44:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Apple objects to this Request on the grounds that the terms “compliance” and “3GPP standards” are vague and ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request

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1 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
2 or governed by a protective order preventing its production, or otherwise seeks confidential,
3 proprietary or trade secret information of third parties. Apple further objects to this Request for
4 Admission to the extent it requires information outside Apple’s possession, custody and control,
5 including, for example, information concerning components that Apple has purchased from third
6 parties.
7

8 **REDACTED**

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

11 Admit that Apple has tested the iPad 3G in the United States for compliance with a 3GPP
12 carrier’s network.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

14 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
15 carrier’s network” are vague and ambiguous. Apple further objects to this Request on the
16 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
17 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
18 this Request to the extent it seeks information that is subject to a confidentiality or non-
19 disclosure agreement or governed by a protective order preventing its production, or otherwise
20 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
21 to this Request for Admission to the extent it requires information outside Apple’s possession,
22 custody and control, including, for example, information concerning components that Apple has
23 purchased from third parties.
24

25
26 **REDACTED**

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

5 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
6 standards” are vague and ambiguous. Apple further objects to this Request that the phrase “a
7 third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the
8 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
9 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
10 this Request to the extent it seeks information that is subject to a confidentiality or non-
11 disclosure agreement or governed by a protective order preventing its production, or otherwise
12 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
13 to this Request for Admission to the extent it requires information outside Apple’s possession,
14 custody and control, including, for example, information concerning components that Apple has
15 purchased from third parties.
16
17

18 **REDACTED**

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

22
23 Admit that a third party has tested the iPad 3G in the United States for compliance with a
24 3GPP carrier’s network.
25
26
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RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Apple objects to this Request on the grounds that the terms “compliance” and “3GPP carrier’s network” are vague and ambiguous. Apple further objects to this Request that the phrase “a third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement or governed by a protective order preventing its production, or otherwise seeks confidential, proprietary or trade secret information of third parties. Apple further objects to this Request for Admission to the extent it requires information outside Apple’s possession, custody and control, including, for example, information concerning components that Apple has purchased from third parties.

REDACTED

REQUEST FOR ADMISSION NO. 48:

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

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Apple objects to this Request on the grounds that the terms “compliance” and “3GPP standards” are vague and ambiguous. Apple further objects to this Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to this Request

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1 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
2 or governed by a protective order preventing its production, or otherwise seeks confidential,
3 proprietary or trade secret information of third parties. Apple further objects to this Request for
4 Admission to the extent it requires information outside Apple’s possession, custody and control,
5 including, for example, information concerning components that Apple has purchased from third
6 parties.
7

8 **REDACTED**

9
10 **REQUEST FOR ADMISSION NO. 49:**

11 Admit that Apple has tested the iPhone 4 in the United States for compliance with a
12 3GPP carrier’s network.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

14 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
15 carrier’s network” are vague and ambiguous. Apple further objects to this Request on the
16 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
17 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
18 this Request to the extent it seeks information that is subject to a confidentiality or non-
19 disclosure agreement or governed by a protective order preventing its production, or otherwise
20 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
21 to this Request for Admission to the extent it requires information outside Apple’s possession,
22 custody and control, including, for example, information concerning components that Apple has
23 purchased from third parties.
24

25
26 **REDACTED**

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

5 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
6 standards” are vague and ambiguous. Apple further objects to this Request that the phrase “a
7 third party” is vague, ambiguous and overly broad. Apple further objects to this Request on the
8 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
9 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
10 this Request to the extent it seeks information that is subject to a confidentiality or non-
11 disclosure agreement or governed by a protective order preventing its production, or otherwise
12 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
13 to this Request for Admission to the extent it requires information outside Apple’s possession,
14 custody and control, including, for example, information concerning components that Apple has
15 purchased from third parties.
16
17

18 REDACTED

21
22
23 **REQUEST FOR ADMISSION NO. 51:**

24 Admit that a third party has tested the iPhone 4 in the United States for compliance with a
25 3GPP carrier’s network.
26
27
28

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

2 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
3 carrier’s network” are vague and ambiguous. Apple further objects to this Request that the
4 phrase “a third party” is vague, ambiguous and overly broad. Apple further objects to this
5 Request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated
6 to lead to the discovery of admissible evidence to the extent that it is not limited in time. Apple
7 also objects to this Request to the extent it seeks information that is subject to a confidentiality or
8 non-disclosure agreement or governed by a protective order preventing its production, or
9 otherwise seeks confidential, proprietary or trade secret information of third parties. Apple
10 further objects to this Request for Admission to the extent it requires information outside Apple’s
11 possession, custody and control, including, for example, information concerning components that
12 Apple has purchased from third parties.
13
14

15 **REDACTED**
16
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20 **REQUEST FOR ADMISSION NO. 52:**

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

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

24 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
25 standards” are vague and ambiguous. Apple further objects to this Request on the grounds that it
26 is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of
27 admissible evidence to the extent that it is not limited in time. Apple also objects to this Request
28

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1 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
2 or governed by a protective order preventing its production, or otherwise seeks confidential,
3 proprietary or trade secret information of third parties. Apple further objects to this Request for
4 Admission to the extent it requires information outside Apple’s possession, custody and control,
5 including, for example, information concerning components that Apple has purchased from third
6 parties.
7

8 **REDACTED**

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

10 Admit that Apple has tested the iPad 2 in the United States for compliance with a 3GPP
11 carrier’s network.

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

13 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
14 carrier’s network” are vague and ambiguous. Apple further objects to this Request on the
15 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
16 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
17 this Request to the extent it seeks information that is subject to a confidentiality or non-
18 disclosure agreement or governed by a protective order preventing its production, or otherwise
19 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
20 to this Request for Admission to the extent it requires information outside Apple’s possession,
21 custody and control, including, for example, information concerning components that Apple has
22 purchased from third parties.
23

24 **REDACTED**

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

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

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

5 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
6 standards” are vague and ambiguous. Apple further objects to this Request on the grounds that it
7 is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of
8 admissible evidence to the extent that it is not limited in time. Apple also objects to this Request
9 to the extent it seeks information that is subject to a confidentiality or non-disclosure agreement
10 or governed by a protective order preventing its production, or otherwise seeks confidential,
11 proprietary or trade secret information of third parties. Apple further objects to this Request for
12 Admission to the extent it requires information outside Apple’s possession, custody and control,
13 including, for example, information concerning components that Apple has purchased from third
14 parties.
15

16 **REDACTED**
17

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.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

22 Apple objects to this Request on the grounds that the terms “compliance” and “3GPP
23 carrier’s network” are vague and ambiguous. Apple further objects to this Request on the
24 grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the
25 discovery of admissible evidence to the extent that it is not limited in time. Apple also objects to
26 this Request to the extent it seeks information that is subject to a confidentiality or non-
27

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1 disclosure agreement or governed by a protective order preventing its production, or otherwise
2 seeks confidential, proprietary or trade secret information of third parties. Apple further objects
3 to this Request for Admission to the extent it requires information outside Apple's possession,
4 custody and control, including, for example, information concerning components that Apple has
5 purchased from third parties.
6

7 **REDACTED**

8 Dated: October 26, 2011

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CERTIFICATE OF SERVICE

1
2 The undersigned hereby certifies that a true and correct copy of the above and foregoing
3 document has been served on October 26, 2011 by electronic mail upon the following:
4

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