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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

**DECLARATION OF ERIK OLSON IN  
 SUPPORT OF SAMSUNG'S MOTION TO  
 COMPEL APPLE TO PRODUCE  
 RECIPROCAL EXPEDITED  
 DISCOVERY**

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I, Erik Olson, declare:

1. I am an attorney in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”). I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify to such facts under oath.

2. Attached hereto as **Exhibit 1** is a true and correct copy of an e-mail that I sent to Jason R. Bartlett, of Morrison & Foerster LLP, counsel for Apple, Inc., on June 6, 2011.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a document entitled “Patent Local Rule 2-2 Interim Model Protective Order,” which was attached to my June 6 e-mail to Mr. Bartlett.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a document entitled “Stipulated Modification to Patent L.R. 2-2 Interim Model Protective Order for Purposes of Expedited Discovery,” which was attached to my June 6 email to Mr. Bartlett.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on June 10, 2011.

By /s/ Erik Olson  
Erik Olson