

1 APPLE INC., a California corporation,
 2 Plaintiff,
 3 vs.
 4 SAMSUNG ELECTRONICS CO., LTD., a
 5 Korean business entity, SAMSUNG
 6 ELECTRONICS AMERICA, INC., a New
 7 York corporation, and SAMSUNG
 8 TELECOMMUNICATIONS AMERICA,
 9 LLC, a Delaware limited liability company,
 10 Defendants.
 11 SAMSUNG ELECTRONICS CO., LTD., a
 12 Korean business entity, SAMSUNG
 13 ELECTRONICS AMERICA, INC., a New
 14 York corporation, and SAMSUNG
 15 TELECOMMUNICATIONS AMERICA,
 16 LLC, a Delaware limited liability company,
 17 Counterclaim-Plaintiffs,
 18 v.
 19 APPLE INC., a California corporation,
 20 Counterclaim-Defendant.

Civil Action No. 11-CV-01846-LHK

DECLARATION OF SAKU HIETA
PUBLIC REDACTED VERSION

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1 I, Saku Hieta, declare as follows:

2 1. I have been continuously employed by Apple Inc. since October 4, 2010 as Senior
3 Manager, Wireless Procurement. My responsibilities include managing the supply chain for the
4 baseband processor chips incorporated in Apple's iPhone and iPad products.

5 2. Apple has sold the iPhone 3G, iPhone 3GS, iPhone 4, iPad 3G, and iPad 2 3G in
6 the United States. The iPhone 3G, iPhone 3GS, iPhone 4 (UMTS version), iPad 3G, and iPad 2
7 3G (UMTS version) that have been sold in the United States contain [REDACTED]
8 [REDACTED]
9 [REDACTED]

10 3. [REDACTED]
11 [REDACTED] that have been used in the iPhone 3G, iPhone 3GS, iPhone 4 (UMTS version),
12 iPad 3G, and iPad 2 3G (UMTS version) sold in the United States.

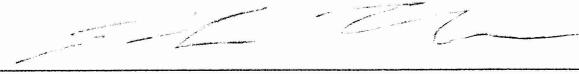
13 4. On January 31, 2011, Intel Corporation announced the completion of the
14 acquisition of the Infineon Technologies AG Wireless Solutions business.¹

15 5. [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 6. Attached as exhibits to this declaration are invoices memorializing sales [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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27 ¹ http://newsroom.intel.com/community/intel_newsroom/blog/2011/01/31/intel-completes-
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1 I declare under penalty of perjury that the foregoing is true and correct to the best of my
2 knowledge. Executed on this 21st day of January, 2012, in Cupertino, California.

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6 Saku Hieta

Dated: January 21, 2012

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13 acquisition-of-infineon-s-wireless-solutions-business