

Mueller Exhibit 56

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21 Attorneys for SAMSUNG ELECTRONICS CO.,
22 LTD., SAMSUNG ELECTRONICS AMERICA,
23 INC. and SAMSUNG
24 TELECOMMUNICATIONS AMERICA, LLC

25 UNITED STATES DISTRICT COURT

26 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

27 APPLE INC., a California corporation,

28 Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS**

[PATENT L.R. 3-1, 3-2]

1 Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and
2 Samsung Telecommunications America, LLC (collectively "Samsung") submits this Disclosure of
3 Asserted Claims and Infringement Contentions pursuant to Patent Local Rules 3-1 and 3-2 for
4 U.S. Patent Nos. 6,928,604, 7,050,410, 7,069,055, 7,079,871, 7,200,792, 7,362,867, 7,386,001,
5 7,447,516, 7,456,893, 7,577,460, 7,675,941, and 7,698,711 ("Samsung patents").

6 **I. IDENTIFICATION OF INFRINGED CLAIMS AND ACCUSED PRODUCTS**
7 **[PATENT L.R. 3-1(a)-(d)]**

8 Samsung provides the information required by Patent Local Rule 3-1 subsections (a), (b),
9 (c), and (d) in the following exhibits:

10 **Exhibit A** U.S. Patent No. 6,928,604
11 **Exhibit B** U.S. Patent No. 7,050,410
12 **Exhibit C** U.S. Patent No. 7,069,055
13 **Exhibit D** U.S. Patent No. 7,079,871
14 **Exhibit E** U.S. Patent No. 7,200,792
15 **Exhibit F** U.S. Patent No. 7,362,867
16 **Exhibit G** U.S. Patent No. 7,386,001
17 **Exhibit H** U.S. Patent No. 7,447,516
18 **Exhibit I** U.S. Patent No. 7,456,893
19 **Exhibit J** U.S. Patent No. 7,577,460
20 **Exhibit K** U.S. Patent No. 7,675,941
21 **Exhibit L** U.S. Patent No. 7,698,711

22 The infringement contentions set forth in Exhibits A-L are exemplary and not exhaustive.

23 Apple infringes the Samsung patents under 35 U.S.C. § 271(a), (b) and/or (c). Samsung
24 further accuses any other Apple products that Apple is currently developing, making and using
25 including but not limited any newer but unreleased versions of the iPhone or iPad products.
26 Despite Samsung's requests for discovery on these products, Apple has withheld this information
27 to date and consequently Samsung has not had the opportunity to analyze how these products
28 infringe Samsung's patents. Accordingly, Samsung reserves its right to supplement this disclosure

1 to include any additional Apple products it identifies through discovery and its continuing
2 investigation. Samsung further reserves the right to supplement its disclosure to include any
3 additional information it learns about the accused Apple products through discovery (which is at
4 its earliest stages) and its continuing investigation.

5 **II. LITERAL INFRINGEMENT AND DOCTRINE OF EQUIVALENTS**
6 **[PATENT L.R. 3-1(e)]**

7 The accused Apple products literally infringe the asserted claims of the Samsung patents.
8 To the extent that any element or limitation of the asserted claims is not found to have literal
9 correspondence in the accused Apple products, the accused Apple products infringe under the
10 doctrine of equivalents.

11 **III. PRIORITY DATES**
12 **[PATENT L.R. 3-1(f)]**

13 The asserted claims of the Samsung patents are entitled to at least the priority dates listed
14 on the face of each patent or identified in the prosecution histories of each patent. Samsung's
15 investigation is continuing and reserves the right to establish earlier priority and invention dates
16 for the asserted claims in the Samsung patents.

17 **IV. PRODUCTS PRACTICING THE CLAIMED INVENTIONS**
18 **[PATENT L.R. 3-1(g)]**

19 **Exhibit M** discloses exemplary Samsung products that practice the claimed inventions of
20 the Samsung patents.

21 **V. APPLE'S WILLFUL INFRINGEMENT**
22 **[PATENT L.R. 3-1(h)]**

23 Before initiating this lawsuit, Apple was aware that its products infringed many Samsung
24 patents, including patents Samsung has asserted against Apple in this action. Despite this
25 knowledge, Apple continued to infringe Samsung's patents and continued to act in an objectively
26 reckless manner. Apple has willfully infringed these patents since at least September 2010 when
27 Samsung informed Apple of its infringement.
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1 **VI. DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE**
2 **[PATENT L.R. 3-2]**

3 Samsung is not presently aware of any Patent L.R. 3-2(a) documents.

4 Documents relating to Patent L.R. 3-2(b) are being produced concurrently herewith
5 bearing bates numbers SAMNDCA00019700- SAMNDCA00019931.

6 Documents relating to Patent L.R. 3-2(c) are being produced concurrently herewith bearing
7 bates numbers SAMNDCA00003980- SAMNDCA00008459.

8 Documents relating to Patent L.R. 3-2(d) are being produced concurrently herewith
9 bearing bates numbers SAMNDCA00009423- SAMNDCA00009433.

10 Documents relating to Patent L.R. 3-2(e) are being produced concurrently herewith bearing
11 bates numbers SAMNDCA00009434- SAMNDCA00011027; SAMNDCA00011050-
12 SAMNDCA00019356. Samsung will also make available for inspection Samsung devices that
13 practice the Samsung patents.

14 DATED: September 7, 2011

QUINN EMANUEL URQUHART & SULLIVAN LLP

16 By /s/ Todd M. Briggs

17 Todd M. Briggs

18 Attorneys for Defendants

19 SAMSUNG ELECTRONICS CO., LTD.,

SAMSUNG ELECTRONICS AMERICA, INC. and

20 SAMSUNG TELECOMMUNICATIONS

21 AMERICA, LLC
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 7, 2011, I served **SAMSUNG'S DISCLOSURE OF**
3 **ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS** on the following via email:

4 **ATTORNEYS FOR APPLE INC.**

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

/s/ Todd M. Briggs