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14 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
15 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
16

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19
20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

26 Defendant.
27

CASE NO. 11-cv-01846-LHK

**DECLARATION OF ALEX BAXTER IN
SUPPORT OF DEFENDANT SAMSUNG'S
MOTION TO SUPPLEMENT
INVALIDITY CONTENTIONS**

Date: February 16, 2012

Time: 1:30 p.m.

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

**[PROPOSED] PUBLIC REDACTED
VERSION**

1 I, Alex Baxter, declare:

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

7 2. Attached hereto as **Exhibit A** is a true and correct copy of a letter from M. Ducca
8 to J. Bartlett, dated 10-18-2011.

9 3. Attached hereto as **Exhibit B** is a true and correct copy of a letter from M. Ducca
10 to M. Mazza, dated 11-01-2011.

11 4. Attached hereto as **Exhibit C** is a true and correct copy of a letter from M. Ducca
12 to J. Bartlett, dated 11-10-2011.

13 5. Attached hereto as **Exhibit D** is a true and correct copy of an email from R. Hung.
14 to M. Ducca, sent on 11-11-2011.

15 6. Attached hereto as **Exhibit E** is a true and correct copy of a letter from V. Maroulis
16 to J. Bartlett, dated 11-22-2011.

17 7. Attached hereto as **Exhibit F** is a true and correct copy of a letter from M. Mazza
18 to R. Kassabian, dated 12-15-2011.

19 8. Attached hereto as **Exhibit G** is a true and correct copy of a letter from J. Bartlett
20 to M. Ducca, dated 12-22-2011.

21 9. Attached hereto as **Exhibit H** is a true and correct copy of a letter from T. Briggs to
22 R. Hung, dated 1-5-2012.

23 10. Attached hereto as **Exhibit I** is a true and correct copy of a letter from M. Mazza to
24 T. Briggs, dated 1-8-2012.

25 11. Attached hereto as **Exhibit J** is a true and correct copy of a letter from J. Bartlett to
26 D. Hutnyan, dated 1-12-2012.

27 12. Attached hereto as **Exhibit K** is a true and correct copy of a letter from T. Briggs to
28 R. Hung, dated 1-24-2012.

- 1 13. Attached hereto as **Exhibit L** is a true and correct copy of a letter from M. Ducca
2 to M. Mazza, dated 10-24-2011.
- 3 14. Attached hereto as **Exhibit M** is a true and correct copy of an email sent from M.
4 Mazza to M. Ducca, dated 10-24-11.
- 5 15. Attached hereto as **Exhibit N** is a true and correct copy of a letter from R. Hung to
6 T. Briggs, dated 1-26-2011.
- 7 16. Attached hereto as **Exhibit O** is a true and correct excerpt from the deposition of
8 Imran Chaudhri.
- 9 17. Attached hereto as **Exhibit P** is a true and correct excerpt from the deposition of
10 Bas Ording.
- 11 18. Attached hereto as **Exhibit Q** is a true and correct excerpt from the deposition of
12 Steven Christensen.
- 13 19. Attached hereto as **Exhibit R** is a true and correct excerpt from the deposition of
14 Richard Woolley.
- 15 20. Attached hereto as **Exhibit S** is a true and correct excerpt from the deposition of
16 Shawn Day.
- 17 21. Attached hereto as **Exhibit T** is a true correct copy of the [REDACTED]
18 [REDACTED] produced by Cirque Corporation as CIRQUE0024988-25094, and marked as
19 Exhibit 5 to the Deposition of Richard Woolley.
- 20 22. Attached hereto as **Exhibit U** is a true correct copy of the [REDACTED]
21 [REDACTED] produced by Cirque Corporation as CIRQUE0051482-
22 51503, and marked as Exhibit 6 to the Deposition of Richard Woolley.
- 23 23. Attached hereto as **Exhibit V** is a true correct copy of the [REDACTED]
24 [REDACTED] produced by Cirque Corporation as CIRQUE0051639-
25 51657, and marked as Exhibit 7 to the Deposition of Richard Woolley.
- 26 24. Attached hereto as **Exhibit W** is a true and correct copy of Apple's Objections and
27 Responses to Samsung's First Set of Interrogatories, served by Apple on September 12, 2011.
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1 **GENERAL ORDER ATTESTATION**

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I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Alex Baxter.

/s/ Victoria Maroulis