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

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

Defendant.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF TODD BRIGGS IN
SUPPORT OF 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, Todd Briggs, declare:

2 1. I am a partner 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 1** is a true and correct copy of Exhibit V-4 from
8 Samsung’s invalidity contentions for the ’129 Patent, citing U.S. Patent No. 5,565,658.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Exhibit P-9 from
10 Samsung’s invalidity contentions for the ’607 Patent, citing A.K. Leeper, “Integration of a Clear
11 Capacitive Touch Screen with a 1/8-VGA FSTN-LCD to Form LCD-Based Touchpad.”

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of Exhibit Q from
13 Samsung’s invalidity contentions for the ’607 Patent, citing U.S. Patent No. 7,030,860.

14 5. Attached hereto as **Exhibit 4** is a true and correct copy of Samsung’s intended
15 supplemental invalidity contentions for the ’891 Patent, Exhibit M-15, showing Mac OS X version
16 10.0.

17 6. Attached hereto as **Exhibit 5** is a true and correct copy of Samsung’s intended
18 supplemental invalidity contentions for the ’002 Patent, Exhibit D-8, showing SuperClock.

19 7. Attached hereto as **Exhibit 6** is a true and correct copy of Samsung’s intended
20 supplemental invalidity contentions for the ’381 Patent, Exhibit G-8, showing Glimpse.

21 8. Attached hereto as **Exhibit 7** is a true and correct copy of Samsung’s intended
22 supplemental invalidity contentions for the ’129 Patent, Exhibit V-10, showing the Cirque
23 GlidePoint.

24 9. Attached hereto as **Exhibit 8** is a true and correct copy of Samsung’s intended
25 supplemental invalidity contentions for the ’607 Patent, Exhibit P-12, showing U.S. Patent No.
26 7,030,860.

27 10. Attached hereto as **Exhibit 9** is a video clip showing the operation of the Mac OS
28 10.0 “brightness window.”

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11. Attached hereto as **Exhibit 10** is a video clip showing the operation of SuperClock.

12. Attached hereto as **Exhibit 11** is a video clip showing the operation of Glimpse.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood Shores, California on January 26, 2012.

/s/ Todd Briggs _____

Todd Briggs

