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    Counterclaim-Defendant APPLE INC.
12

13   UNITED STATES DISTRICT COURT

14   NORTHERN DISTRICT OF CALIFORNIA

15   SAN JOSE DIVISION

16

17 APPLE INC., a California corporation,   Case No.   11-cv-01846-LHK (PSG)

18   Plaintiff,   **DECLARATION OF MIA MAZZA
                                                 IN SUPPORT OF APPLE'S
19   v.   MOTION TO SHORTEN TIME
                                                 FOR BRIEFING AND HEARING
20 SAMSUNG ELECTRONICS CO., LTD., A   ON APPLE'S MOTION TO
    Korean business entity; SAMSUNG   COMPEL TIMELY
21 ELECTRONICS AMERICA, INC., a New York   PRODUCTION OF FOREIGN-
    corporation; SAMSUNG   LANGUAGE AND OTHER
22 TELECOMMUNICATIONS AMERICA, LLC, a   DOCUMENTS IN ADVANCE OF
    Delaware limited liability company.,   RELATED DEPOSITIONS**
23
                Defendants.
24   Date: February 1, 2012
                                                Time: 10:00 a.m.
25   Place: Courtroom 5, 4th Floor
                                                Judge: Hon. Paul S. Grewal
26

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1   I, Mia Mazza, declare as follows:

2   1.   I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.

3   ("Apple"). I am licensed to practice law in the State of California. Unless otherwise indicated, I

4   have personal knowledge of the matters stated herein or understand them to be true from

5   members of my litigation team. I make this Declaration in support of Apple's Motion to Shorten

6   Time for Briefing and Hearing on Apple's Motion to Compel Timely Production of Foreign-

7   Language and Other Documents in Advance of Related Depositions ("Motion to Compel").

8   2.   Apple expects to depose more than 40 Samsung witnesses in Korea in the next

9   month, on nearly a daily basis between February 2 and March 2 (often with multiple depositions

10   per day).

11   3.   As detailed in Apple's Motion to Compel, Samsung has gone from producing no

12   documents to dumping tens of thousands of pages—mostly in Korean—on the eve of each

13   foreign-language deposition. For example, Samsung produced more than 44,000 pages of

14   Ah Young Kim's Korean-language materials within the 40 hours preceding the deposition of that

15   witness, including 3,069 pages 40 minutes after the deposition began.

16   4.   Due to the requirement of translation, it takes roughly twice as long to review

17   Korean-language documents and use them in preparation for deposition as it takes to review and

18   use English-language documents.

19   5.   Apple has filed the Motion to Compel at its earliest opportunity after satisfying the

20   lead trial counsel meet and confer requirement. Samsung has not proposed an alternative

21   expedited schedule, and did not accept Apple's request to stipulate to the schedule proposed by

22   Apple.

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

24   27th day of January, 2012 at San Francisco, California.

25   */s/ Mia Mazza*
                                           Mia Mazza
26

27

28

ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Mia Mazza has concurred in this filing.

Dated: January 27, 2012

/s/ *Michael A. Jacobs*
Michael A. Jacobs