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LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

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16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

23 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

24 TELECOMMUNICATIONS AMERICA,

LLC, a Delaware limited liability company,

25 Defendant.

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CASE NO. 11-cv-01846-LHK

**DECLARATION OF ALBERT P. BEDECARRÉ IN SUPPORT OF SAMSUNG'S MOTION TO PERMIT ITS EXPERT SAMUEL LUCENTE TO REVIEW MATERIALS DESIGNATED UNDER THE PROTECTIVE ORDER**

Date: February 7, 2012

Time: 10:00 a.m.

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal



1           6.       Attached hereto as **Exhibit E** is a true and correct copy of a January 16, 2012 email  
2 from Ms. Kassabian to Ms. Mazza regarding Apple's objections to Mr. Lucente.

3           7.       Attached hereto as **Exhibit F** is a true and correct copy of a January 16, 2012 email  
4 from Ms. Mazza to Ms. Kassabian regarding "clos[ing] the loop" on Mr. Lucente and Apple's  
5 proposed expert Peter Bressler.

6           8.       Attached hereto as **Exhibit G** is a true and correct copy of a January 17, 2012 email  
7 from Ms. Mazza to Ms. Kassabian and a true and correct copy of the attached letter requesting  
8 further information regarding Mr. Lucente. The letter is dated January 16, 2012, but was actually  
9 emailed to Ms. Kassabian on the afternoon of January 17, 2012.

10          9.       Attached hereto as **Exhibit H** is a true and correct copy of a January 20, 2012 letter  
11 from Ms. Kassabian to Ms. Mazza providing additional information regarding Mr. Lucente.

12          10.      Attached hereto as **Exhibit I** is a true and correct copy of a January 24, 2012 letter  
13 from Ms. Kassabian to Ms. Mazza regarding Apple's continued objections to Mr. Lucente and lack  
14 of response regarding expert Dr. David Anders.

15          11.      Attached hereto as **Exhibit J** is a true and correct copy of a January 24, 2012 letter  
16 from Marc Pernick, counsel for Apple, to Mr. Binder requesting additional information regarding  
17 Mr. Anders and Mr. Lucente.

18          12.      Attached hereto as **Exhibit K** is a true and correct copy of a January 25, 2012 letter  
19 from Ms. Kassabian to Ms. Mazza regarding its objections to Mr. Lucente and Mr. Anders.

20          13.      Attached hereto as **Exhibit L** is a true and correct copy of a January 28, 2012 letter  
21 from Ms. Kassabian to Ms. Mazza regarding Apple's continued objections to Mr. Lucente.

22          14.      Attached hereto as **Exhibit M** is a true and correct copy of a January 30, 2012 letter  
23 from Mr. Pernick to Ms. Kassabian regarding Apple's continued objections to Mr. Lucente.

24          15.      This evening, I called Mr. Lucente after receiving the January 30, 2012 letter from  
25 Mr. Pernick to discuss the content of Mr. Lucente's prior disclosures and the accuracy or  
26 inaccuracy of the websites that counsel for Apple had brought to our attention for the first time  
27 this evening. Mr. Lucente confirmed that these websites are neither accurate nor up to date. He  
28 confirmed that his prior disclosures, including his curriculum vitae and the responses to two

1 rounds of further questions from Apple, have all been accurate and that he ceased to consult or  
2 work for HP by no later than November 2010. Mr. Lucente also confirmed that he currently does  
3 no design work related to mobile devices nor does he consult for any clients in this field.

4 I declare under penalty of perjury under the laws of the United States of America  
5 that the foregoing is true and correct.

6 Executed January 30, 2012, at Los Angeles, California.

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8 /s/ Albert P. Bedecarré  
9 Albert P. Bedecarré

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**General Order 45 Attestation**

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to e-file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Albert P. Bedecarré has concurred in this filing.

/s/ Victoria Maroulis