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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

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 SCOTT HALL IN  
SUPPORT OF SAMSUNG'S NOTICE OF  
MOTION AND MOTION TO COMPEL  
APPLE TO RESPOND TO SAMSUNG'S  
REQUESTS FOR ADMISSION 101-190**

Date: March 6, 2012

Time: 10:00 am

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

1 I, Scott Hall, 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 January 7, 2012 letter  
8 sent from D. Hutnyan to M. Mazza. This letters show Samsung's request that Apple, Inc.  
9 ("Apple") answer Samsung's Requests for Admission ("RFAs") nos. 101-190 or, in the alternative,  
10 to meet and confer on the topic.

11 3. Attached hereto as **Exhibit B** is a true and correct copy of a January 16, 2012 letter  
12 from J. Bartlett to D. Hutnyan. This letter concerns Apple's refusal to answer Samsung's RFAs  
13 nos. 101-190.

14 4. On January 16, 2012, on behalf of Samsung, I attended a Lead Counsel Meet and  
15 Confer with counsel for Apple. At this meeting, the parties discussed Apple's refusal to answer  
16 Samsung's RFAs nos. 101-190. Samsung asked Apple to reverse its position and provide  
17 responses. Apple maintained its objections to Samsung's request and the parties were unable to  
18 resolve the issue informally.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed in  
20 Redwood Shores, California on January 31, 2012.

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/s/ Scott Hall

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Scott Hall

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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 Scott Hall has concurred in this filing.

*/s/ Victoria Maroulis*