

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

50 California Street, 22nd Floor

3 San Francisco, California 94111

Telephone: (415) 875-6600

4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Bar No. 177129)

kevinjohnson@quinnemanuel.com

6 Victoria F. Maroulis (Bar No. 202603)

victoriamaroulis@quinnemanuel.com

7 555 Twin Dolphin Drive, 5th Floor

Redwood Shores, California 94065-2139

8 Telephone: (650) 801-5000

Facsimile: (650) 801-5100

9

10 Michael T. Zeller (Bar No. 196417)

michaelzeller@quinnemanuel.com

11 865 S. Figueroa St., 10th Floor

Los Angeles, California 90017

12 Telephone: (213) 443-3000

Facsimile: (213) 443-3100

13

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

27 Defendant.

28

CASE NO. 11-cv-01846-LHK

**DECLARATION OF SAM STAKE IN
SUPPORT OF SAMSUNG'S UNOPPOSED
MOTION FOR ISSUANCE OF A
REQUEST FOR JUDICIAL ASSISTANCE**

Date: March 13, 2012

Time: 10:00 am

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

1 I, Sam Stake, 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 1** is a true and correct copy of excerpts from the
8 deposition of Joshua Strickon on October 20, 2011.

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the
10 deposition of Brian Huppi on October 18, 2011.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of a document entitled
12 "Apple Q79 Vision" produced by Apple in this matter.

13 5. Attached hereto as **Exhibit 4** is a true and correct copy of an email from David
14 Bungo on November 20, 2003.

15 6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the
16 deposition of Christopher Stringer on August 3, 2011.

17 7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the
18 deposition of Eugene Whang on October 27, 2011.

19

20 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
21 Francisco, California on February 3, 2012.

22

23

/s/ Sam Stake

24

Sam Stake

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

EXHIBITS 1-6
FILED UNDER SEAL