

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 JASON BARTLETT (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 425 Market Street
 8 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE
 william.lee@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 60 State Street
 Boston, MA 02109
 Telephone: (617) 526-6000
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)
 mark.selwyn@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 950 Page Mill Road
 Palo Alto, California 94304
 Telephone: (650) 858-6000
 Facsimile: (650) 858-6100

Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC., a California corporation,
 Plaintiff,
 v.
 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company,
 Defendants.

Case No. 11-cv-01846-LHK

**DECLARATION OF
 RICHARD S.J. HUNG IN
 SUPPORT OF APPLE'S
 OPPOSITION TO SAMSUNG'S
 MOTION TO SUPPLEMENT
 INVALIDITY CONTENTIONS**

1 I, Richard S.J. Hung, do hereby declare as follows:

2 1. I am a partner at the law firm of Morrison & Foerster LLP, attorneys of record in
3 this action for Apple Inc. (“Apple”). I submit this declaration in support of Apple’s Opposition to
4 Samsung’s Motion for Leave to Supplement Its Infringement Contentions. Unless otherwise
5 indicated, I have personal knowledge of the matters set forth below. If called as a witness, I could
6 and would testify competently as follows.

7 2. On October 7, 2011, Samsung served its 60-page initial Invalidity Contentions
8 with 79 invalidity claim charts.

9 3. Attached as Exhibit A is a true and correct copy of correspondence from
10 Marissa Ducca to Jason Bartlett dated November 8, 2011.

11 4. Attached as Exhibit B is a true and correct copy of correspondence from
12 Jason Bartlett to Rachel Kassabian dated November 20, 2011.

13 5. Attached as Exhibit C is a true and correct copy of excerpts of the deposition of
14 Imran Chaudhri taken on October 14, 2011. Page 13, lines 1-2 have been redacted as irrelevant to
15 avert the need to file under seal.

16 6. Attached as Exhibit D is a true and correct copy of excerpts of the deposition of
17 Steven Christensen taken on October 26, 2011.

18 7. Attached as Exhibit E is a true and correct copy of excerpts of the deposition of
19 Ravin Balakrishnan taken on August 16, 2011.

20 8. Attached as Exhibit F is a true and correct copy of excerpts of a document
21 subpoena issued to Cirque Corporation on October 26, 2011.

22 9. Attached as Exhibit G is a true and correct copy of excerpts of a deposition
23 subpoena issued to Cirque Corporation on December 22, 2011.

24 10. Attached as Exhibit H is a true and correct copy of excerpts of the deposition of
25 Richard Woolley of Cirque Corporation taken on January 19, 2012.

26 11. Attached as Exhibit I is a true and correct copy of excerpts of a deposition
27 subpoena issued to Synaptics, Inc. on December 7, 2011.

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

12. Attached as Exhibit J is a true and correct copy of excerpts of the deposition of Shawn P. Day of Synaptics, Inc. taken on January 19, 2012.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on February 9, 2012 at San Francisco, California.

/s/ Richard S.J. Hung
Richard S.J. Hung