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11 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 APPLE INC.,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 22 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company,
 23 Defendants.

Case No. 11-cv-01846-LHK (PSG)
**DECLARATION OF JASON R.
 BARTLETT IN SUPPORT OF
 APPLE'S OPPOSITION TO
 SAMSUNG'S 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, JASON R. BARTLETT, declare as follows:

2 1. I am a partner at the law firm of Morrison & Foerster LLP, counsel for Apple Inc.
3 (“Apple”). I am licensed to practice law in the State of California. I have personal knowledge of
4 the matters stated herein or understand them to be true from members of my litigation team. I
5 make this declaration in support of Apple’s Opposition to Samsung’s Motion to Compel.

6 2. On November 23, 2011, Samsung served its Second Set of Requests for
7 Admission on Apple. Requests 101 through 190 consist of 45 pairs of requests asking Apple first
8 to admit that certain design patents are “substantially the same,” then that the same design patents
9 are *not* substantially the same.

10 3. The parties agreed to extensions of time for discovery responses that would have
11 been due over the holidays, including Samsung’s Second Set of RFAs. A true and correct copy of
12 the email exchange between Apple’s counsel and Samsung’s counsel discussing these extensions
13 is attached as **Exhibit A**.

14 4. Apple served its Objections and Responses to Samsung’s Second Set of Requests
15 for Admission on January 6, 2012. The parties exchanged letters on January 7 and 16, met and
16 conferred on January 16, and were unable to resolve the dispute.

17 5. On February 1, 2012, Samsung served its Third Set of Requests for Admission, a
18 true and correct copy of which is attached as **Exhibit B**. This set contains 72 comparisons of
19 design patents to design patents, a total of 142 requests, similar to those in Samsung’s Second Set
20 of Requests for Admission.

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1 6. On February 7, 2012, Samsung served its Fifth Set of Requests for Admission, a
2 true and correct copy of which is attached as **Exhibit C**. This set contains 92 comparisons of
3 design patents to Samsung products, 1 comparison of a design patent to a design patent, and
4 16 comparisons of design patents to third party products, totaling 109 comparisons across
5 215 requests.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed this
7 14th day of February, 2012 at San Francisco, California.

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/s/ Jason R. Bartlett
Jason R. Bartlett