

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. 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 (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS
 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK

19 Plaintiff,

**SAMSUNG'S FIFTH SET OF REQUESTS
 FOR ADMISSION TO APPLE INC.**

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

24 Defendants.
 25

1 Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendants and
2 Counterclaimants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and
3 Samsung Telecommunications America, LLC (collectively “Samsung”) propound the following
4 requests for admission on Plaintiff and Counterclaim Defendant Apple Inc. (“Apple”). Apple
5 shall admit or deny the following statements, and serve those responses on Defendants’ counsel,
6 Quinn Emanuel Urquhart & Sullivan, LLP, 555 Twin Dolphin Drive, 5th Floor, Redwood Shores,
7 California 94065, within 30 days, or such other time as the parties agree or the Court orders.
8 These requests for admission are continuing in nature and Apple must timely supplement the
9 answers to them under Fed. R. Civ. P. 26(e) whenever an answer is in some material respect
10 incomplete or incorrect.

11 **DEFINITIONS**

12 The requests for production, as well as the Instructions provided above, are subject to and
13 incorporate the following definitions and instructions as used herein:

14 1. The terms “APPLE,” “PLAINTIFF,” “YOU,” and “YOUR” shall refer to Apple,
15 Inc., any predecessor or successor of Apple, Inc., and any past or present parent, division,
16 subsidiary, affiliate, joint venture, associated organization, director, officer, agent, employee,
17 consultant, staff member, or other representative of Apple, Inc., including counsel and patent
18 agents, in any country.

19 2. The term “DEFENDANTS” and “SAMSUNG” means Samsung Electronics Co.,
20 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC.

21 3. The term “This Lawsuit” shall mean the action entitled *Apple, Inc. v. Samsung*
22 *Electronics Co., Ltd.*, Case No. 11-cv-01846-LHK.

23 4. The term “FUNCTIONAL” means having practical utility, or being capable of
24 having or serving a useful purpose.

25 5. The term “SUBSTANTIALLY THE SAME,” in the context of comparing two
26 designs, shall mean that the resemblance is such as to deceive an ordinary observer, giving such
27 attention as a purchaser usually gives, inducing him or her to purchase one design while supposing
28 it to be the other.

1 6. The term “AMENDED COMPLAINT” means the Amended Complaint YOU filed
2 in This Lawsuit.

3 7. “REGISTERED ICON MARKS” means AND refers to the purported trademarks
4 that YOU contend SAMSUNG has infringed in This Lawsuit.

5 8. The term “person” or “persons” refers to any individual, corporation,
6 proprietorship, association, joint venture, company, partnership or other business or legal entity,
7 including governmental bodies and agencies. The masculine includes the feminine and vice versa;
8 the singular includes the plural and vice versa.

9 9. The term “SUBSTANTIALLY THE SAME,” in the context of comparing two
10 designs, shall mean that the resemblance is such as to deceive an ordinary observer, giving such
11 attention as a purchaser usually gives, inducing him or her to purchase one design while supposing
12 it to be the other.

13 10. The terms “any,” “all,” “every,” and “each” shall each mean and include the other
14 as necessary to bring within the scope of these requests for production all responses that might
15 otherwise be construed to be outside of their scope.

16 11. The terms “and,” “or,” and “and/or” shall be construed either disjunctively or
17 conjunctively as necessary to bring within the scope of these requests for production all responses
18 that might otherwise be construed to be outside of its scope.

19 12. The term “thing” refers to any physical specimen or tangible item in Your
20 possession, custody or control, including research and development samples, prototypes,
21 productions samples and the like.

22 13. The terms “referring to,” “relating to,” “concerning” or “regarding” shall mean
23 containing, describing, discussing, embodying, commenting upon, identifying, incorporating,
24 summarizing, constituting, comprising or are otherwise pertinent to the matter or any aspect
25 thereof.

26 14. The use of the singular form of any word includes the plural and vice versa, as
27 necessary to bring within the scope of these requests for production all responses that might
28 otherwise be construed to be outside of its scope.

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15. The use of a verb in any tense shall be construed as the use of the verb in all other tenses.

INSTRUCTIONS

1. If YOU cannot fully respond to the following Requests after exercising due diligence to secure the information requested thereby, so state, and specify the portion of each Request that cannot be responded to fully and completely. State what efforts were made to obtain the requested information, documents or communications and the facts relied upon that support the contention that the Request cannot be answered fully and completely; and state what knowledge, information or belief YOU have concerning the portion of any such Requests not responded to.

2. YOUR obligation to respond to these Requests is continuing and YOUR responses are to be supplemented to include subsequently acquired DOCUMENTS, COMMUNICATIONS or information in accordance with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

1 **REQUESTS FOR ADMISSION**

2
3 **REQUEST FOR ADMISSION NO. 2012:**

4 Admit that the external hardware design of SAMSUNG’s Galaxy Tab is
5 SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

6
7 **REQUEST FOR ADMISSION NO. 2013:**

8 Admit that the external hardware design of SAMSUNG’s Galaxy Tab is not
9 SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

10
11 **REQUEST FOR ADMISSION NO. 2014:**

12 Admit that the external hardware design of SAMSUNG’s Galaxy Tab 10.1 is
13 SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

14
15 **REQUEST FOR ADMISSION NO. 2015:**

16 Admit that the external hardware design of SAMSUNG’s Galaxy Tab 10.1 is not
17 SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

18
19 **REQUEST FOR ADMISSION NO. 2016:**

20 Admit that since electronic devices are often portable, they are susceptible to being
21 damaged, such as being scratched, dented, broken, and the like, when transported or used.

22
23 **REQUEST FOR ADMISSION NO. 2017:**

24 Admit that the trend of smaller, lighter, and more powerful portable computing devices
25 presents a continuing design challenge in the design of some components of the portable
26 computing devices.

1 **REQUEST FOR ADMISSION NO. 2018:**

2 Admit that one design challenge associated with the portable computing device is the
3 design of the enclosures used to house the device's various internal components.
4
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6 **REQUEST FOR ADMISSION NO. 2019:**

7 Admit that the thin form factor of the design shown in the D'889 patent reduces the size
8 and weight of the device.
9

10 **REQUEST FOR ADMISSION NO. 2020:**

11 Admit that the thin form factor of the design shown in the D'889 patent increases the
12 portability of the device.
13

14 **REQUEST FOR ADMISSION NO. 2021:**

15 Admit that the rounded corners of the design shown in the D'889 patent reduce any
16 possibility of damaging internal components of the device.
17

18 **REQUEST FOR ADMISSION NO. 2022:**

19 Admit that by forming the edges of the cover glass of the design in United States Patent
20 D504,889 to correspond to its particular predetermined geometry, the cover glass pieces become
21 stronger and thus less susceptible to damage.
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23 **REQUEST FOR ADMISSION NO. 2023:**

24 Admit that the rounded corners of the design shown in United States Patent D504,889
25 enables the cover glass pieces to become more receptive to uniform chemical strengthening.
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1 **REQUEST FOR ADMISSION NO. 2024:**

2 Admit that the smooth back panel of the design shown in United States Patent D504,889 is
3 an integral structural member of the device.

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5 **REQUEST FOR ADMISSION NO. 2025:**

6 Admit that the rim surrounding the front surface of the design shown in United States
7 Patent D504,889 secures the front face to the rest of the device.

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9 **REQUEST FOR ADMISSION NO. 2026:**

10 Admit that the rounded corners of the design shown in United States Patent D504,889
11 create a more continuous transition from one surface to another.

12
13 **REQUEST FOR ADMISSION NO. 2027:**

14 Admit that the smooth back panel of the design shown in United States Patent D504,889
15 allows the device to lie flat on a table or desk.

16
17 **REQUEST FOR ADMISSION NO. 2028:**

18 Admit that the continuous, flat surface of the design shown in United States Patent
19 D504,889 is easier to clean than a surface that is sunken into the body of the device.

20
21 **REQUEST FOR ADMISSION NO. 2029:**

22 Admit that the continuous, flat surface of the design shown in United States Patent
23 D504,889 makes edge-to-edge operation of the touch screen with a finger easier than it would be
24 were the screen sunken into the body of the device.

25
26 **REQUEST FOR ADMISSION NO. 2030:**

27 Admit that the transparent or translucent front surface of the design in United States Patent
28 D504,889 prevents damage to the components underneath it.

1 **REQUEST FOR ADMISSION NO. 2031:**

2 Admit that the transparent or translucent front surface of the design in United States Patent
3 D504,889 enables users to view the rectangular feature or “screen” centered on the front face of
4 the design.

5
6 **REQUEST FOR ADMISSION NO. 2032:**

7 Admit that the design shown in United States Patent D504,889 is FUNCTIONAL.

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9 **REQUEST FOR ADMISSION NO. 2033:**

10 Admit that the design shown in United States Patent D504,889 is not FUNCTIONAL.

11

12

13 **REQUEST FOR ADMISSION NO. 2034:**

14 Admit that the external hardware design of SAMSUNG’s Fascinate is SUBSTANTIALLY
15 THE SAME as the design shown in United States Patent D593,087.

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17 **REQUEST FOR ADMISSION NO. 2035:**

18 Admit that the external hardware design of SAMSUNG’s Fascinate is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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21 **REQUEST FOR ADMISSION NO. 2036:**

22 Admit that the external hardware design of SAMSUNG’s Galaxy Ace is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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25 **REQUEST FOR ADMISSION NO. 2037:**

26 Admit that the external hardware design of SAMSUNG’s Galaxy Ace is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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1 **REQUEST FOR ADMISSION NO. 2038:**

2 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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5 **REQUEST FOR ADMISSION NO. 2039:**

6 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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9 **REQUEST FOR ADMISSION NO. 2040:**

10 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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13 **REQUEST FOR ADMISSION NO. 2041:**

14 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

16
17 **REQUEST FOR ADMISSION NO. 2042:**

18 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

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21 **REQUEST FOR ADMISSION NO. 2043:**

22 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

24
25 **REQUEST FOR ADMISSION NO. 2044:**

26 Admit that the external hardware design of SAMSUNG's Infuse 4G is SUBSTANTIALLY
27 THE SAME as the design shown in United States Patent D593,087.

28

1 **REQUEST FOR ADMISSION NO. 2045:**

2 Admit that the external hardware design of SAMSUNG's Infuse 4G is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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5 **REQUEST FOR ADMISSION NO. 2046:**

6 Admit that the external hardware design of SAMSUNG's Mesmerize is
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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9 **REQUEST FOR ADMISSION NO. 2047:**

10 Admit that the external hardware design of SAMSUNG's Mesmerize is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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13 **REQUEST FOR ADMISSION NO. 2048:**

14 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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17 **REQUEST FOR ADMISSION NO. 2049:**

18 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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21 **REQUEST FOR ADMISSION NO. 2050:**

22 Admit that the external hardware design of SAMSUNG's Vibrant is SUBSTANTIALLY
23 THE SAME as the design shown in United States Patent D593,087.
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25 **REQUEST FOR ADMISSION NO. 2051:**

26 Admit that the external hardware design of SAMSUNG's Vibrant is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.
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REQUEST FOR ADMISSION NO. 2052:

Admit that the rectangular shape of the design shown in the D’087 patent is a convenient shape for being held by a human hand.

REQUEST FOR ADMISSION NO. 2053:

Admit that the rounded corners of the design shown in the D’087 patent help the device to avoid snagging on clothes or bags.

REQUEST FOR ADMISSION NO. 2054:

Admit that the rounded corners of the design shown in the D’087 patent make the device more comfortable to hold than if it had squared corners.

REQUEST FOR ADMISSION NO. 2055:

Admit that the rounded corners of the design shown in the D’087 patent are less expensive to manufacture than square corners.

REQUEST FOR ADMISSION NO. 2056:

Admit that the rounded corners of the design shown in the D’087 patent are less prone to breakage or damage than square corners.

REQUEST FOR ADMISSION NO. 2057:

Admit that the placement of the rounded speaker on the upper portion of the front surface above the display screen as shown in the D’087 patent design aligns the speaker most naturally with the ear while the phone is being cradled in its upright position.

1 **REQUEST FOR ADMISSION NO. 2058:**

2 Admit that the horizontal slot shape of the speaker opening in the design shown in the
3 D'087 patent enhances the quality of the sound emitting from the slot.

4
5 **REQUEST FOR ADMISSION NO. 2059:**

6 Admit that the horizontal slot shape of the speaker in the design shown in the D'087 patent
7 better preserves the structural integrity of the front face of the phone than would a circular speaker
8 hole.

9
10 **REQUEST FOR ADMISSION NO. 2060:**

11 Admit that the horizontal slot shape of the speaker in the design shown in the D'087 patent
12 minimizes interference with the size of the display screen.

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14 **REQUEST FOR ADMISSION NO. 2061:**

15 Admit that the bezel in the design shown in the D'087 patent attaches the cover glass of the
16 phone to the body of the phone.

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18 **REQUEST FOR ADMISSION NO. 2062:**

19 Admit that the rounded corners of the design shown in the D'087 patent reduce any
20 possibility of damaging internal components of the device.

21
22 **REQUEST FOR ADMISSION NO. 2063:**

23 Admit that the bezel surrounding the front surface of the design shown in the D'087 patent
24 holds the display in place by attaching the display to the device's housing.

25
26 **REQUEST FOR ADMISSION NO. 2064:**

27 Admit that the bezel in the design shown in the D'087 patent is used as part of the antenna
28 for the device.

1 **REQUEST FOR ADMISSION NO. 2065:**

2 Admit that the bezel in the design shown in the D'087 patent serves as a rigid frame for the
3 device.

4
5 **REQUEST FOR ADMISSION NO. 2066:**

6 Admit that the bezel in the design shown in the D'087 patent shields the display screen of
7 the device from impact in the event the device is dropped.

8
9 **REQUEST FOR ADMISSION NO. 2067:**

10 Admit that the bezel in the design shown in the D'087 patent makes the device more rigid
11 along its length than would be possible if no bezel were used.

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13 **REQUEST FOR ADMISSION NO. 2068:**

14 Admit that the bezel in the design shown in the D'087 patent is formed from a conductive
15 material.

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17 **REQUEST FOR ADMISSION NO. 2069:**

18 Admit that the bezel in the design shown in the D'087 patent is electronically connected to
19 the antenna ground.

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21 **REQUEST FOR ADMISSION NO. 2070:**

22 Admit that the bezel in the design shown in the D'087 patent enhances the structural
23 integrity of the device.

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25 **REQUEST FOR ADMISSION NO. 2071:**

26 Admit that the bezel in the design shown in the D'087 patent is the structural backbone of
27 the device.

28

1 **REQUEST FOR ADMISSION NO. 2072:**

2 Admit that mounting alignment fixtures are molded into the bezel or rim of the design
3 shown in the D'087 patent to ensure proper alignment of the device's various components.
4

5 **REQUEST FOR ADMISSION NO. 2073:**

6 Admit that touch screen functionality is integrated into the display screen of the design
7 shown in the D'087 patent.
8

9 **REQUEST FOR ADMISSION NO. 2074:**

10 Admit that the transparent or translucent front surface of the design in the D'087 patent is
11 susceptible to damage when the device is stressed in an abusive manner.
12

13 **REQUEST FOR ADMISSION NO. 2075:**

14 Admit that by forming the edges of the cover glass of the design shown in the D'087 patent
15 to correspond to its particular predetermined geometry, the cover glass pieces become stronger and
16 thus less susceptible to damage.
17

18 **REQUEST FOR ADMISSION NO. 2076:**

19 Admit that the rounded corners of the design shown in the D'087 patent enable the cover
20 glass pieces to become more receptive to uniform chemical strengthening.
21

22 **REQUEST FOR ADMISSION NO. 2077:**

23 Admit that the rounded corners of the design shown in the D'087 patent create a more
24 continuous transition from one surface to another.
25

26 **REQUEST FOR ADMISSION NO. 2078:**

27 Admit that the lack of significant ornamentation in the design shown in the D'087 patent
28 helps prevent the user from getting distracted from the screen.

1 **REQUEST FOR ADMISSION NO. 2079:**

2 Admit that the area of the front face surrounding the display screen in the design shown in
3 the D'087 patent helps to hide many of the components underneath it.

4
5 **REQUEST FOR ADMISSION NO. 2080:**

6 Admit that the large size of the rectangular feature or “screen” centered on the design
7 shown in the D'087 patent enables the screen to be viewed more easily.

8
9 **REQUEST FOR ADMISSION NO. 2081:**

10 Admit that the narrow borders on either side of the rectangular feature or “screen” centered
11 on the design shown in the D'087 patent provide a visual cue to users of where the rectangular
12 feature or “screen” begins and ends.

13
14 **REQUEST FOR ADMISSION NO. 2082:**

15 Admit that the narrow borders on either side of the rectangular feature or “screen” centered
16 on the design in the D'087 patent are capable of protecting the rectangular feature or “screen”
17 from cracks or other damage.

18
19 **REQUEST FOR ADMISSION NO. 2083:**

20 Admit that the design shown in the D'087 patent is FUNCTIONAL.

21
22 **REQUEST FOR ADMISSION NO. 2084:**

23 Admit that the design shown in the D'087 patent is not FUNCTIONAL.

24
25
26 **REQUEST FOR ADMISSION NO. 2085:**

27 Admit that the external hardware design of SAMSUNG’s Fascinate is SUBSTANTIALLY
28 THE SAME as the design shown in United States Patent D618,677.

1 **REQUEST FOR ADMISSION NO. 2086:**

2 Admit that the external hardware design of SAMSUNG's Fascinate is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
4

5 **REQUEST FOR ADMISSION NO. 2087:**

6 Admit that the external hardware design of SAMSUNG's Galaxy Ace is
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
8

9 **REQUEST FOR ADMISSION NO. 2088:**

10 Admit that the external hardware design of SAMSUNG's Galaxy Ace is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
12

13 **REQUEST FOR ADMISSION NO. 2089:**

14 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
16

17 **REQUEST FOR ADMISSION NO. 2090:**

18 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
20

21 **REQUEST FOR ADMISSION NO. 2091:**

22 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
24

25 **REQUEST FOR ADMISSION NO. 2092:**

26 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
28

1 **REQUEST FOR ADMISSION NO. 2093:**

2 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

4
5 **REQUEST FOR ADMISSION NO. 2094:**

6 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

8
9 **REQUEST FOR ADMISSION NO. 2095:**

10 Admit that the external hardware design of SAMSUNG's Infuse 4G is SUBSTANTIALLY
11 THE SAME as the design shown in United States Patent D618,677.

12
13 **REQUEST FOR ADMISSION NO. 2096:**

14 Admit that the external hardware design of SAMSUNG's Infuse 4G is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

16
17 **REQUEST FOR ADMISSION NO. 2097:**

18 Admit that the external hardware design of SAMSUNG's Mesmerize is
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

20
21 **REQUEST FOR ADMISSION NO. 2098:**

22 Admit that the external hardware design of SAMSUNG's Mesmerize is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

24
25 **REQUEST FOR ADMISSION NO. 2099:**

26 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

28

1 **REQUEST FOR ADMISSION NO. 2100:**

2 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
4

5 **REQUEST FOR ADMISSION NO. 2101:**

6 Admit that the external hardware design of SAMSUNG's Vibrant is SUBSTANTIALLY
7 THE SAME as the design shown in United States Patent D618,677.
8

9 **REQUEST FOR ADMISSION NO. 2102:**

10 Admit that the external hardware design of SAMSUNG's Vibrant is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.
12

13 **REQUEST FOR ADMISSION NO. 2103:**

14 Admit that the rectangular shape of the design shown in the D'677 patent is a convenient
15 shape for being held by a human hand.
16

17 **REQUEST FOR ADMISSION NO. 2104:**

18 Admit that the rounded corners of the design shown in the D'677 patent help the device to
19 avoid snagging on clothes or bags.
20

21 **REQUEST FOR ADMISSION NO. 2105:**

22 Admit that the rounded corners of the design shown in the D'677 patent make the device
23 more comfortable to hold than if it had squared corners.
24

25 **REQUEST FOR ADMISSION NO. 2106:**

26 Admit that the rounded corners of the design shown in the D'677 patent are less expensive
27 to manufacture than square corners.
28

1 **REQUEST FOR ADMISSION NO. 2107:**

2 Admit that the rounded corners of the design shown in the D'677 patent are less prone to
3 breakage or damage than square corners.

4
5 **REQUEST FOR ADMISSION NO. 2108:**

6 Admit that the placement of the rounded speaker on the upper portion of the front surface
7 above the display screen as shown in the D'677 patent design aligns the speaker most naturally
8 with the ear while the phone is being cradled in its upright position.

9
10 **REQUEST FOR ADMISSION NO. 2109:**

11 Admit that the horizontal slot shape of the speaker opening in the design shown in the
12 D'677 patent enhances the quality of the sound emitting from the slot.

13
14 **REQUEST FOR ADMISSION NO. 2110:**

15 Admit that the horizontal slot shape of the speaker in the design shown in the D'677 patent
16 better preserves the structural integrity of the front face of the phone than would a circular speaker
17 hole.

18
19 **REQUEST FOR ADMISSION NO. 2111:**

20 Admit that the horizontal slot shape of the speaker in the design shown in the D'677 patent
21 minimizes interference with the size of the display screen.

22
23 **REQUEST FOR ADMISSION NO. 2112:**

24 Admit that touch screen functionality is integrated into the display screen of the design
25 shown in the D'677 patent.

1 **REQUEST FOR ADMISSION NO. 2113:**

2 Admit that by forming the edges of the cover glass of the design in the D'677 patent to
3 correspond to its particular predetermined geometry, the cover glass pieces become stronger and
4 thus less susceptible to damage.

5
6 **REQUEST FOR ADMISSION NO. 2114:**

7 Admit that the smooth back panel of the design shown in the D'677 patent is an integral
8 structural member of the device.

9
10 **REQUEST FOR ADMISSION NO. 2115:**

11 Admit that the lack of significant ornamentation in the design shown in the D'677 patent
12 helps to prevent the user from getting distracted from the screen.

13
14 **REQUEST FOR ADMISSION NO. 2116:**

15 Admit that the black colored mask surrounding the display screen in the design shown in
16 the D'677 patent is less costly to produce than a white colored mask.

17
18 **REQUEST FOR ADMISSION NO. 2117:**

19 Admit that the black colored mask surrounding the display screen in the design shown in
20 the D'677 patent can be manufactured more easily than a white mask.

21
22 **REQUEST FOR ADMISSION NO. 2118:**

23 Admit that the black colored mask surrounding the display screen in the design shown in
24 the D'677 patent can be manufactured with fewer problems than a white mask.

25
26 **REQUEST FOR ADMISSION NO. 2119:**

27 Admit that the area of the front face surrounding the display screen in the design shown in
28 the D'677 patent helps to hide many of the electronic device's components underneath it.

1 **REQUEST FOR ADMISSION NO. 2120:**

2 Admit that the large size of the rectangular feature or “screen” centered on the design in
3 the D’677 patent enables the screen to be viewed more easily than a smaller screen.

4
5 **REQUEST FOR ADMISSION NO. 2121:**

6 Admit that the narrow borders on either side of the rectangular feature or “screen” centered
7 on the design in the D’677 patent provide a visual cue to users of where the rectangular feature or
8 “screen” begins and ends.

9
10 **REQUEST FOR ADMISSION NO. 2122:**

11 Admit that the narrow borders on either side of the rectangular feature or “screen” centered
12 on the design in the D’677 patent serves a manufacturing purpose due to the fact that the
13 rectangular feature or “screen” centered on the design is comprised of different materials than the
14 rectangular-shaped front face on the other side of the narrow borders.

15
16 **REQUEST FOR ADMISSION NO. 2123:**

17 Admit that the borders on all sides of the rectangular feature or “screen” centered on the
18 design shown in the D’677 patent are capable of protecting the rectangular feature or “screen”
19 from cracks or other damage.

20
21 **REQUEST FOR ADMISSION NO. 2124:**

22 Admit that the front surface of the design shown in the D’677 patent prevents damage to
23 the components underneath it.

24
25 **REQUEST FOR ADMISSION NO. 2125:**

26 Admit that the design shown in the D’677 patent is FUNCTIONAL.
27
28

1 **REQUEST FOR ADMISSION NO. 2126:**

2 Admit that the design shown in the D'677 patent is not FUNCTIONAL.
3
4

5 **REQUEST FOR ADMISSION NO. 2127:**

6 Admit that the external hardware design of SAMSUNG's Fascinate is SUBSTANTIALLY
7 THE SAME as the design shown in United States Patent D622,270.
8

9 **REQUEST FOR ADMISSION NO. 2128:**

10 Admit that the external hardware design of SAMSUNG's Fascinate is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
12

13 **REQUEST FOR ADMISSION NO. 2129:**

14 Admit that the external hardware design of SAMSUNG's Galaxy Ace is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
16

17 **REQUEST FOR ADMISSION NO. 2130:**

18 Admit that the external hardware design of SAMSUNG's Galaxy Ace is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
20

21 **REQUEST FOR ADMISSION NO. 2131:**

22 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
24

25 **REQUEST FOR ADMISSION NO. 2132:**

26 Admit that the external hardware design of SAMSUNG's Galaxy Prevail is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
28

1 **REQUEST FOR ADMISSION NO. 2133:**

2 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

4
5 **REQUEST FOR ADMISSION NO. 2134:**

6 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

8
9 **REQUEST FOR ADMISSION NO. 2135:**

10 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

12
13 **REQUEST FOR ADMISSION NO. 2136:**

14 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

16
17 **REQUEST FOR ADMISSION NO. 2137:**

18 Admit that the external hardware design of SAMSUNG's Infuse 4G is SUBSTANTIALLY
19 THE SAME as the design shown in United States Patent D622,270.

20
21 **REQUEST FOR ADMISSION NO. 2138:**

22 Admit that the external hardware design of SAMSUNG's Infuse 4G is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

24
25 **REQUEST FOR ADMISSION NO. 2139:**

26 Admit that the external hardware design of SAMSUNG's Mesmerize is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

28

1 **REQUEST FOR ADMISSION NO. 2140:**

2 Admit that the external hardware design of SAMSUNG's Mesmerize is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
4

5 **REQUEST FOR ADMISSION NO. 2141:**

6 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
8

9 **REQUEST FOR ADMISSION NO. 2142:**

10 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
12

13 **REQUEST FOR ADMISSION NO. 2143:**

14 Admit that the external hardware design of SAMSUNG's Vibrant is SUBSTANTIALLY
15 THE SAME as the design shown in United States Patent D622,270.
16

17 **REQUEST FOR ADMISSION NO. 2144:**

18 Admit that the external hardware design of SAMSUNG's Vibrant is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
20

21

22 **REQUEST FOR ADMISSION NO. 2145:**

23 Admit that the rectangular shape of the design shown in the D'270 patent is a convenient
24 shape for being held by a human hand.
25

26 **REQUEST FOR ADMISSION NO. 2146:**

27 Admit that the rounded corners of the design shown in the D'270 patent help the electronic
28 device to avoid snagging on clothes or bags.

1 **REQUEST FOR ADMISSION NO. 2147:**

2 Admit that the rounded corners of the design shown in the D'270 patent make the device
3 more comfortable to hold than if it had squared corners.

4
5 **REQUEST FOR ADMISSION NO. 2148:**

6 Admit that the rounded corners of the design shown in the D'270 patent are less expensive
7 to manufacture than square corners.

8
9 **REQUEST FOR ADMISSION NO. 2149:**

10 Admit that the rounded corners of the design shown in the D'270 patent are less prone to
11 breakage or damage than square corners.

12
13 **REQUEST FOR ADMISSION NO. 2150:**

14 Admit that the bezel in the design shown in the D'270 patent attaches the face plate of the
15 phone to the body of the phone.

16
17 **REQUEST FOR ADMISSION NO. 2151:**

18 Admit that the lack of significant ornamentation in the design shown in the D'270 patent
19 prevents the user from getting distracted from the screen.

20
21 **REQUEST FOR ADMISSION NO. 2152:**

22 Admit that the area of the front face surrounding the display screen in the design shown in
23 the D'270 patent helps to hide many of the electronic device's components underneath it.

24
25 **REQUEST FOR ADMISSION NO. 2153:**

26 Admit that the borders on all side of the rectangular feature or "screen" centered on the
27 design in United States Patent D622,270 provide a visual cue to users of where the rectangular
28 feature or "screen" begins and ends.

1 **REQUEST FOR ADMISSION NO. 2154:**

2 Admit that the borders on all sides of the rectangular feature or “screen” centered on the
3 design in United States Patent D622,270 are capable of separating the hardware components that
4 comprise the rectangular feature or “screen” from the components that comprise the rectangular-
5 shaped front face.

6
7 **REQUEST FOR ADMISSION NO. 2155:**

8 Admit that the rounded corners of the design shown in United States Patent D622,270
9 reduce the possibility of damaging internal components of the device.

10

11 **REQUEST FOR ADMISSION NO. 2156:**

12 Admit that the bezel surrounding the front surface of the design shown in United States
13 Patent D622,270 is used to hold the display in place by attaching the display to the device’s
14 housing.

15

16 **REQUEST FOR ADMISSION NO. 2157:**

17 Admit that the bezel of the design shown in United States Patent D622,270 may serve as a
18 rigid frame for the device.

19

20 **REQUEST FOR ADMISSION NO. 2158:**

21 Admit that the bezel of the design shown in United States Patent D622,270 shields the
22 display screen of the device from impact in the event the device is dropped.

23

24 **REQUEST FOR ADMISSION NO. 2159:**

25 Admit that the bezel of the design shown in United States Patent D622,270 makes the
26 device more rigid along its length than would be possible if no bezel were used.

27

28

1 **REQUEST FOR ADMISSION NO. 2160:**

2 Admit that the bezel of the design shown in United States Patent D622,270 is formed from
3 a conductive material.
4

5 **REQUEST FOR ADMISSION NO. 2161:**

6 Admit that the bezel of the design shown in United States Patent D622,270 is
7 electronically connected to the antenna ground.
8

9 **REQUEST FOR ADMISSION NO. 2162:**

10 Admit that the bezel of the design shown in United States Patent D622,270 helps to
11 prevent damage to the display screen.
12

13 **REQUEST FOR ADMISSION NO. 2163:**

14 Admit that the smooth back panel of the design shown in United States Patent D622,270 is
15 shorted to an internal ground plan in the device to create an effectively larger ground plane
16 element for that device.
17

18 **REQUEST FOR ADMISSION NO. 2164:**

19 Admit that the bezel or rim of the design shown in United States Patent D622,270
20 enhances the structural integrity of the device.
21

22 **REQUEST FOR ADMISSION NO. 2165:**

23 Admit that mounting alignment fixtures is molded into the bezel or rim of the design
24 shown in United States Patent D622,270 to ensure proper alignment of the device's various
25 components.
26
27
28

1 **REQUEST FOR ADMISSION NO. 2166:**

2 Admit that touch screen functionality is integrated into the display screen of the design
3 shown in United States Patent D622,270.
4

5 **REQUEST FOR ADMISSION NO. 2167:**

6 Admit that the transparent or translucent front surface of the design in United States Patent
7 D622,270 is susceptible to damage when the device is stressed in an abusive manner.
8

9 **REQUEST FOR ADMISSION NO. 2168:**

10 Admit that by forming the edges of the cover glass of the design in United States Patent
11 D622,270 to correspond to its particular predetermined geometry, the cover glass pieces become
12 stronger and thus less susceptible to damage.
13

14 **REQUEST FOR ADMISSION NO. 2169:**

15 Admit that the bezel of the design shown in United States Patent D622,270 is shorted to
16 printed circuit board conductors or other internal ground plane structures in the device to create a
17 larger ground plane element for the device or its antenna.
18

19 **REQUEST FOR ADMISSION NO. 2170:**

20 Admit that the smooth back panel of the design shown in United States Patent D622,270 is
21 an integral structural member of the device.
22

23 **REQUEST FOR ADMISSION NO. 2171:**

24 Admit that the rounded corners of the design shown in United States Patent D622,270
25 create a more continuous transition from one surface to another.
26
27
28

1 **REQUEST FOR ADMISSION NO. 2172:**

2 Admit that the borders on all sides of the rectangular feature or “screen” centered on the
3 design in United States Patent D622,270 are capable of protecting the rectangular feature or
4 “screen” from cracks or other damage.

5
6 **REQUEST FOR ADMISSION NO. 2173:**

7 Admit that the transparent or translucent front surface of the design in United States Patent
8 D622,270 prevents damage to the components underneath it.

9
10 **REQUEST FOR ADMISSION NO. 2174:**

11 Admit that the transparent or translucent front surface of the design in United States Patent
12 D622,270 enables users to view the rectangular feature or “screen” centered on the front face of
13 the design.

14
15 **REQUEST FOR ADMISSION NO. 2175:**

16 Admit that the design shown in United States Patent D622,270 is FUNCTIONAL.

17
18 **REQUEST FOR ADMISSION NO. 2176:**

19 Admit that the design shown in United States Patent D622,270 is not FUNCTIONAL.

20
21 **REQUEST FOR ADMISSION NO. 2177:**

22 Admit that the external hardware design of SAMSUNG’s Captivate is SUBSTANTIALLY
23 THE SAME as the design shown in United States Patent D627,790.

24
25 **REQUEST FOR ADMISSION NO. 2178:**

26 Admit that the external hardware design of SAMSUNG’s Captivate is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

28

1 **REQUEST FOR ADMISSION NO. 2179:**

2 Admit that the external hardware design of SAMSUNG's Continuum is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
4

5 **REQUEST FOR ADMISSION NO. 2180:**

6 Admit that the external hardware design of SAMSUNG's Continuum is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
8

9 **REQUEST FOR ADMISSION NO. 2181:**

10 Admit that the external hardware design of SAMSUNG's Droid Charge is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
12

13 **REQUEST FOR ADMISSION NO. 2182:**

14 Admit that the external hardware design of SAMSUNG's Droid Charge is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
16

17 **REQUEST FOR ADMISSION NO. 2183:**

18 Admit that the external hardware design of SAMSUNG's Epic 4G is SUBSTANTIALLY
19 THE SAME as the design shown in United States Patent D627,790.
20

21 **REQUEST FOR ADMISSION NO. 2184:**

22 Admit that the external hardware design of SAMSUNG's Epic 4G is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
24

25 **REQUEST FOR ADMISSION NO. 2185:**

26 Admit that the external hardware design of SAMSUNG's Exhibit 4G is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
28

1 **REQUEST FOR ADMISSION NO. 2186:**

2 Admit that the external hardware design of SAMSUNG's Exhibit 4G is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
4

5 **REQUEST FOR ADMISSION NO. 2187:**

6 Admit that the external hardware design of SAMSUNG's Fascinate is SUBSTANTIALLY
7 THE SAME as the design shown in United States Patent D627,790.
8

9 **REQUEST FOR ADMISSION NO. 2188:**

10 Admit that the external hardware design of SAMSUNG's Fascinate is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
12

13 **REQUEST FOR ADMISSION NO. 2189:**

14 Admit that the external hardware design of SAMSUNG's Galaxy Ace is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
16

17 **REQUEST FOR ADMISSION NO. 2190:**

18 Admit that the external hardware design of SAMSUNG's Galaxy Ace is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
20

21 **REQUEST FOR ADMISSION NO. 2191:**

22 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
24

25 **REQUEST FOR ADMISSION NO. 2192:**

26 Admit that the external hardware design of SAMSUNG's Galaxy S i9000 is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
28

1 **REQUEST FOR ADMISSION NO. 2193:**

2 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

4
5 **REQUEST FOR ADMISSION NO. 2194:**

6 Admit that the external hardware design of SAMSUNG's Galaxy S 4G is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

8
9 **REQUEST FOR ADMISSION NO. 2195:**

10 Admit that the external hardware design of SAMSUNG's Gem is SUBSTANTIALLY
11 THE SAME as the design shown in United States Patent D627,790.

12
13 **REQUEST FOR ADMISSION NO. 2196:**

14 Admit that the external hardware design of SAMSUNG's Gem is not SUBSTANTIALLY
15 THE SAME as the design shown in United States Patent D627,790.

16
17 **REQUEST FOR ADMISSION NO. 2197:**

18 Admit that the external hardware design of SAMSUNG's Gravity Smart is
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

20
21 **REQUEST FOR ADMISSION NO. 2198:**

22 Admit that the external hardware design of SAMSUNG's Gravity Smart is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

24
25 **REQUEST FOR ADMISSION NO. 2199:**

26 Admit that the external hardware design of SAMSUNG's Indulge is SUBSTANTIALLY
27 THE SAME as the design shown in United States Patent D627,790.

28

1 **REQUEST FOR ADMISSION NO. 2200:**

2 Admit that the external hardware design of SAMSUNG's Indulge is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
4

5 **REQUEST FOR ADMISSION NO. 2201:**

6 Admit that the external hardware design of SAMSUNG's Infuse 4G is SUBSTANTIALLY
7 THE SAME as the design shown in United States Patent D627,790.
8

9 **REQUEST FOR ADMISSION NO. 2202:**

10 Admit that the external hardware design of SAMSUNG's Infuse 4G is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
12

13 **REQUEST FOR ADMISSION NO. 2203:**

14 Admit that the external hardware design of SAMSUNG's Mesmerize is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
16

17 **REQUEST FOR ADMISSION NO. 2204:**

18 Admit that the external hardware design of SAMSUNG's Mesmerize is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
20

21 **REQUEST FOR ADMISSION NO. 2205:**

22 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
24

25 **REQUEST FOR ADMISSION NO. 2206:**

26 Admit that the external hardware design of SAMSUNG's Showcase Galaxy S is not
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.
28

1 **REQUEST FOR ADMISSION NO. 2207:**

2 Admit that the external hardware design of SAMSUNG's Vibrant is SUBSTANTIALLY
3 THE SAME as the design shown in United States Patent D627,790.

4
5 **REQUEST FOR ADMISSION NO. 2208:**

6 Admit that the external hardware design of SAMSUNG's Vibrant is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

8
9 **REQUEST FOR ADMISSION NO. 2209:**

10 Admit that the external hardware design of SAMSUNG's Showcase i500 is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

12
13 **REQUEST FOR ADMISSION NO. 2210:**

14 Admit that the external hardware design of SAMSUNG's Showcase i500 is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

16
17 **REQUEST FOR ADMISSION NO. 2211:**

18 Admit that the external hardware design of SAMSUNG's Prevail is SUBSTANTIALLY
19 THE SAME as the design shown in United States Patent D627,790.

20
21 **REQUEST FOR ADMISSION NO. 2212:**

22 Admit that the external hardware design of SAMSUNG's Prevail is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

24
25 **REQUEST FOR ADMISSION NO. 2213:**

26 Admit that the external hardware design of SAMSUNG's Galaxy Tab is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

28

1 **REQUEST FOR ADMISSION NO. 2214:**

2 Admit that the external hardware design of SAMSUNG's Galaxy Tab is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

4
5 **REQUEST FOR ADMISSION NO. 2215:**

6 Admit that the external hardware design of SAMSUNG's Galaxy Tab 10.1 is
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

8
9 **REQUEST FOR ADMISSION NO. 2216:**

10 Admit that the external hardware design of SAMSUNG's Galaxy Tab 10.1 is not
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

12
13 **REQUEST FOR ADMISSION NO. 2217:**

14 Admit that the external hardware design of SAMSUNG's Galaxy Tab 7.0 is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

16
17 **REQUEST FOR ADMISSION NO. 2218:**

18 Admit that the external hardware design of SAMSUNG's Galaxy Tab 7.0 is not
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

20
21
22 **REQUEST FOR ADMISSION NO. 2219:**

23 Admit that the arrangement, size, and shape of the icons in the design shown in United
24 States Patent D627,790 reduces visual clutter.

25
26 **REQUEST FOR ADMISSION NO. 2220:**

27 Admit that the arrangement, size and shape of the icons in the design shown in United
28 States Patent D627,790 can help save space on the display screen.

1 **REQUEST FOR ADMISSION NO. 2221:**

2 Admit that the arrangement, size, and shape of the rounded icons in the design shown in
3 United States Patent D627,790 can make it easier for users to navigate to a particular user
4 interface element.

5
6 **REQUEST FOR ADMISSION NO. 2222:**

7 Admit that the arrangement, size, and shape of the icons in the design shown in United
8 States Patent D627,790 give users a more efficient means for executing commands.

9
10 **REQUEST FOR ADMISSION NO. 2223:**

11 Admit that the arrangement of the icons in the design shown in United States Patent
12 D627,790 can help avoid information overload.

13
14 **REQUEST FOR ADMISSION NO. 2224:**

15 Admit that the arrangement of the icons in the design shown in United States Patent
16 D627,790 can aid their effective use.

17
18 **REQUEST FOR ADMISSION NO. 2225:**

19 Admit that the size of the rounded square features or “icons” in the design shown in United
20 States Patent D627,790 enables users to identify the icons without the icons taking up too much
21 space on the display screen.

22
23 **REQUEST FOR ADMISSION NO. 2226:**

24 Admit that the size of the rounded square features or “icons” in the design shown in United
25 States Patent D627,790 enables users to use their fingers to tap or touch the screen and more easily
26 select an icon.

27
28

1 **REQUEST FOR ADMISSION NO. 2227:**

2 Admit that the design shown in United States Patent D627,790 is FUNCTIONAL.

4 **REQUEST FOR ADMISSION NO. 2228:**

5 Admit that the design shown in United States Patent D627,790 is not FUNCTIONAL.

8 **REQUEST FOR ADMISSION NO. 2229:**

9 Admit that overall appearance of the graphical user interface of SAMSUNG's Captivate is
10 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

12 **REQUEST FOR ADMISSION NO. 2230:**

13 Admit that overall appearance of the graphical user interface of SAMSUNG's Captivate is
14 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

16 **REQUEST FOR ADMISSION NO. 2231:**

17 Admit that overall appearance of the graphical user interface of SAMSUNG's Continuum
18 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

20 **REQUEST FOR ADMISSION NO. 2232:**

21 Admit that overall appearance of the graphical user interface of SAMSUNG's Continuum
22 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

24 **REQUEST FOR ADMISSION NO. 2233:**

25 Admit that overall appearance of the graphical user interface of SAMSUNG's Droid
26 Charge is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

1 **REQUEST FOR ADMISSION NO. 2234:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Droid
3 Charge is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
4 D617,334.

5
6 **REQUEST FOR ADMISSION NO. 2235:**

7 Admit that overall appearance of the graphical user interface of SAMSUNG's Epic 4G is
8 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

9
10 **REQUEST FOR ADMISSION NO. 2236:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Epic 4G is
12 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

13
14 **REQUEST FOR ADMISSION NO. 2237:**

15 Admit that overall appearance of the graphical user interface of SAMSUNG's Exhibit 4G
16 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

17
18 **REQUEST FOR ADMISSION NO. 2238:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Exhibit 4G
20 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

21
22 **REQUEST FOR ADMISSION NO. 2239:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Fascinate is
24 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

25
26 **REQUEST FOR ADMISSION NO. 2240:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Fascinate is
28 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

1 **REQUEST FOR ADMISSION NO. 2241:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Ace
3 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
4

5 **REQUEST FOR ADMISSION NO. 2242:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Ace
7 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
8

9 **REQUEST FOR ADMISSION NO. 2243:**

10 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
11 i9000 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
12

13 **REQUEST FOR ADMISSION NO. 2244:**

14 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
15 i9000 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
16 D617,334.
17

18 **REQUEST FOR ADMISSION NO. 2245:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
20 4G is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
21

22 **REQUEST FOR ADMISSION NO. 2246:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
24 4G is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
25

26 **REQUEST FOR ADMISSION NO. 2247:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Gem is
28 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

1 **REQUEST FOR ADMISSION NO. 2248:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Gem is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
4

5 **REQUEST FOR ADMISSION NO. 2249:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Gravity
7 Smart is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
8

9 **REQUEST FOR ADMISSION NO. 2250:**

10 Admit that overall appearance of the graphical user interface of SAMSUNG's Gravity
11 Smart is not SUBSTANTIALLY THE SAME as the design shown in United States D617,334.
12

13 **REQUEST FOR ADMISSION NO. 2251:**

14 Admit that overall appearance of the graphical user interface of SAMSUNG's Indulge is
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
16

17 **REQUEST FOR ADMISSION NO. 2252:**

18 Admit that overall appearance of the graphical user interface of SAMSUNG's Indulge is
19 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
20

21 **REQUEST FOR ADMISSION NO. 2253:**

22 Admit that overall appearance of the graphical user interface of SAMSUNG's Infuse 4G is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
24

25 **REQUEST FOR ADMISSION NO. 2254:**

26 Admit that overall appearance of the graphical user interface of SAMSUNG's Infuse 4G is
27 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.
28

1 **REQUEST FOR ADMISSION NO. 2255:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Mesmerize
3 (Galaxy i500) is SUBSTANTIALLY THE SAME as the design shown in United States Patent
4 D617,334.

5
6 **REQUEST FOR ADMISSION NO. 2256:**

7 Admit that overall appearance of the graphical user interface of SAMSUNG's Mesmerize
8 (Galaxy i500) is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
9 D617,334.

10

11 **REQUEST FOR ADMISSION NO. 2257:**

12 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
13 Galaxy S is SUBSTANTIALLY THE SAME as the design shown in United States Patent
14 D617,334.

15

16 **REQUEST FOR ADMISSION NO. 2258:**

17 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
18 Galaxy S is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
19 D617,334.

20

21 **REQUEST FOR ADMISSION NO. 2259:**

22 Admit that overall appearance of the graphical user interface of SAMSUNG's Vibrant is
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

24

25 **REQUEST FOR ADMISSION NO. 2260:**

26 Admit that overall appearance of the graphical user interface of SAMSUNG's Vibrant is
27 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

28

1 **REQUEST FOR ADMISSION NO. 2261:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
3 i500 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

4
5 **REQUEST FOR ADMISSION NO. 2262:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
7 i500 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
8 D617,334.

9
10 **REQUEST FOR ADMISSION NO. 2263:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Prevail is
12 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

13
14 **REQUEST FOR ADMISSION NO. 2264:**

15 Admit that overall appearance of the graphical user interface of SAMSUNG's Prevail is
16 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

17
18 **REQUEST FOR ADMISSION NO. 2265:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
20 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

21
22 **REQUEST FOR ADMISSION NO. 2266:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
24 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

25
26 **REQUEST FOR ADMISSION NO. 2267:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
28 10.1 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

1 **REQUEST FOR ADMISSION NO. 2268:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
3 10.1 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
4 D617,334.

5
6 **REQUEST FOR ADMISSION NO. 2269:**

7 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
8 7.0 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

9
10 **REQUEST FOR ADMISSION NO. 2270:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
12 7.0 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

13
14
15 **REQUEST FOR ADMISSION NO. 2271:**

16 Admit that the size of the rounded square features or "icons" in the design shown in United
17 States Patent D617,334 enables users to identify the icons without taking up too much space on
18 the screen.

19
20 **REQUEST FOR ADMISSION NO. 2272:**

21 Admit that the size of the rounded square features or "icons" in the design shown in
22 United States Patent D617,334 enables users to use their fingers to tap or touch the screen and
23 more easily select an icon.

24
25 **REQUEST FOR ADMISSION NO. 2273:**

26 Admit that the arrangement of the rounded square features or "icons" in the design shown
27 in United States Patent D627,790 can reduce visual clutter.

28

1 **REQUEST FOR ADMISSION NO. 2274:**

2 Admit that the arrangement of the rounded square features or “icons” in the design shown
3 in United States Patent D627,790 can save space.

4
5 **REQUEST FOR ADMISSION NO. 2275:**

6 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
7 the design shown in United States Patent D627,790 can make it easier for users to navigate to a
8 particular user interface element.

9
10 **REQUEST FOR ADMISSION NO. 2276:**

11 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
12 the design shown in United States Patent D627,790 can give users a more efficient means for
13 executing commands.

14
15 **REQUEST FOR ADMISSION NO. 2277:**

16 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
17 the design shown in United States Patent D627,790 can help avoid information overload.

18
19 **REQUEST FOR ADMISSION NO. 2278:**

20 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
21 the design shown in United States Patent D627,790 can aid their effective use.

22
23 **REQUEST FOR ADMISSION NO. 2279:**

24 Admit that the rectangular shape and size of the screen in the design shown in United
25 States Patent D617,334 is a convenient shape and size for being held by a human hand.

26
27
28

1 **REQUEST FOR ADMISSION NO. 2280:**

2 Admit that the location of the dock at the bottom of the display screen in United States
3 Patent D617,334 allows users to conveniently access the icons in the dock with their thumbs.
4

5 **REQUEST FOR ADMISSION NO. 2281:**

6 Admit that the design shown in United States Patent D617,334 is FUNCTIONAL.
7

8 **REQUEST FOR ADMISSION NO. 2282:**

9 Admit that the design shown in United States Patent D617,334 is not FUNCTIONAL.
10
11

12 **REQUEST FOR ADMISSION NO. 2283:**

13 Admit that overall appearance of the graphical user interface of SAMSUNG's Captivate is
14 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
15

16 **REQUEST FOR ADMISSION NO. 2284:**

17 Admit that overall appearance of the graphical user interface of SAMSUNG's Captivate is
18 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
19

20 **REQUEST FOR ADMISSION NO. 2285:**

21 Admit that overall appearance of the graphical user interface of SAMSUNG's Continuum
22 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
23

24 **REQUEST FOR ADMISSION NO. 2286:**

25 Admit that overall appearance of the graphical user interface of SAMSUNG's Continuum
26 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
27
28

1 **REQUEST FOR ADMISSION NO. 2287:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Droid
3 Charge is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

4
5 **REQUEST FOR ADMISSION NO. 2288:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Droid
7 Charge is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
8 D604,305.

9
10 **REQUEST FOR ADMISSION NO. 2289:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Epic 4G is
12 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

13
14 **REQUEST FOR ADMISSION NO. 2290:**

15 Admit that overall appearance of the graphical user interface of SAMSUNG's Epic 4G is
16 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

17
18 **REQUEST FOR ADMISSION NO. 2291:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Exhibit 4G
20 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

21
22 **REQUEST FOR ADMISSION NO. 2292:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Exhibit 4G
24 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

25
26 **REQUEST FOR ADMISSION NO. 2293:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Fascinate is
28 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

1 **REQUEST FOR ADMISSION NO. 2294:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Fascinate is
3 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
4

5 **REQUEST FOR ADMISSION NO. 2295:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Ace
7 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
8

9 **REQUEST FOR ADMISSION NO. 2296:**

10 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Ace
11 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
12

13 **REQUEST FOR ADMISSION NO. 2297:**

14 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
15 i9000 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
16

17 **REQUEST FOR ADMISSION NO. 2298:**

18 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
19 i9000 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
20 D604,305.
21

22 **REQUEST FOR ADMISSION NO. 2299:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
24 4G is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
25

26 **REQUEST FOR ADMISSION NO. 2300:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy S
28 4G is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

1 **REQUEST FOR ADMISSION NO. 2301:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Gem is
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
4

5 **REQUEST FOR ADMISSION NO. 2302:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Gem is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
8

9 **REQUEST FOR ADMISSION NO. 2303:**

10 Admit that overall appearance of the graphical user interface of SAMSUNG's Gravity
11 Smart is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
12

13 **REQUEST FOR ADMISSION NO. 2304:**

14 Admit that overall appearance of the graphical user interface of SAMSUNG's Gravity
15 Smart is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
16 D604,305.
17

18 **REQUEST FOR ADMISSION NO. 2305:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Indulge is
20 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
21

22 **REQUEST FOR ADMISSION NO. 2306:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Indulge is
24 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
25

26 **REQUEST FOR ADMISSION NO. 2307:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Infuse 4G is
28 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

1 **REQUEST FOR ADMISSION NO. 2308:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Infuse 4G is
3 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

4
5 **REQUEST FOR ADMISSION NO. 2309:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Mesmerize
7 (Galaxy i500) is SUBSTANTIALLY THE SAME as the design shown in United States Patent
8 D604,305.

9
10 **REQUEST FOR ADMISSION NO. 2310:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Mesmerize
12 (Galaxy i500) is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
13 D604,305.

14
15 **REQUEST FOR ADMISSION NO. 2311:**

16 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
17 Galaxy S is SUBSTANTIALLY THE SAME as the design shown in United States Patent
18 D604,305.

19
20 **REQUEST FOR ADMISSION NO. 2312:**

21 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
22 Galaxy S is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
23 D604,305.

24
25 **REQUEST FOR ADMISSION NO. 2313:**

26 Admit that overall appearance of the graphical user interface of SAMSUNG's Vibrant is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

28

1 **REQUEST FOR ADMISSION NO. 2314:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Vibrant is
3 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
4

5 **REQUEST FOR ADMISSION NO. 2315:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
7 i500 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
8

9 **REQUEST FOR ADMISSION NO. 2316:**

10 Admit that overall appearance of the graphical user interface of SAMSUNG's Showcase
11 i500 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
12 D604,305.
13

14 **REQUEST FOR ADMISSION NO. 2317:**

15 Admit that overall appearance of the graphical user interface of SAMSUNG's Prevail is
16 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
17

18 **REQUEST FOR ADMISSION NO. 2318:**

19 Admit that overall appearance of the graphical user interface of SAMSUNG's Prevail is
20 not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
21

22 **REQUEST FOR ADMISSION NO. 2319:**

23 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
24 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
25

26 **REQUEST FOR ADMISSION NO. 2320:**

27 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
28 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

1 **REQUEST FOR ADMISSION NO. 2321:**

2 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
3 10.1 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
4

5 **REQUEST FOR ADMISSION NO. 2322:**

6 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
7 10.1 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
8 D604,305.
9

10 **REQUEST FOR ADMISSION NO. 2323:**

11 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
12 7.0 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
13

14 **REQUEST FOR ADMISSION NO. 2324:**

15 Admit that overall appearance of the graphical user interface of SAMSUNG's Galaxy Tab
16 7.0 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.
17
18

19 **REQUEST FOR ADMISSION NO. 2325:**

20 Admit that the size of the rounded square features or "icons" in the design shown in United
21 United States Patent D604,305 enables users to identify the icons without the icons taking up too
22 much space on the screen.
23

24 **REQUEST FOR ADMISSION NO. 2326:**

25 Admit that the size of the rounded square features or "icons" in the design shown in
26 United States Patent D604,305 enables users to use their fingers to tap or touch the screen and
27 more easily select an icon.
28

1 **REQUEST FOR ADMISSION NO. 2327:**

2 Admit that the size of the rectangular screen in the design shown in United States Patent
3 D604,305 enables users to view the screen more easily.

4
5 **REQUEST FOR ADMISSION NO. 2328:**

6 Admit that the arrangement of the rounded square features or “icons” in the design shown
7 in United States Patent D627,790 can reduce visual clutter.

8
9 **REQUEST FOR ADMISSION NO. 2329:**

10 Admit that the arrangement of the rounded square features or “icons” in the design shown
11 in United States Patent D627,790 can save space.

12
13 **REQUEST FOR ADMISSION NO. 2330:**

14 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
15 the design shown in United States Patent D627,790 can make it easier for users to navigate to a
16 particular user interface element.

17
18 **REQUEST FOR ADMISSION NO. 2331:**

19 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
20 the design shown in United States Patent D627,790 can give users a more efficient means for
21 executing commands.

22
23 **REQUEST FOR ADMISSION NO. 2332:**

24 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
25 the design shown in United States Patent D627,790 can help avoid information overload.

26
27
28

1 **REQUEST FOR ADMISSION NO. 2333:**

2 Admit that the arrangement, size, and shape of the rounded square features or “icons” in
3 the design shown in United States Patent D627,790 can aid their effective use.

4
5 **REQUEST FOR ADMISSION NO. 2334:**

6 Admit that the rectangular shape and size of the screen in the design shown in United
7 States Patent D604,305 is a convenient shape and size for being held by a human hand.

8
9 **REQUEST FOR ADMISSION NO. 2335:**

10 Admit that the design shown in United States Patent D604,305 makes it easier to translate
11 a user’s gestures into usable commands.

12
13 **REQUEST FOR ADMISSION NO. 2336:**

14 Admit that the images chosen for the icons in the design shown in United States Patent
15 D617,334 are to intended to make the underlying user interface element associated with each icon
16 intuitive and obvious.

17
18 **REQUEST FOR ADMISSION NO. 2337:**

19 Admit that the design shown in United States Patent D604,305 is FUNCTIONAL.

20
21 **REQUEST FOR ADMISSION NO. 2338:**

22 Admit that the design shown in United States Patent D604,305 is not FUNCTIONAL.

23
24
25 **REQUEST FOR ADMISSION NO. 2339:**

26 Admit that the design of the iPhone is comfortable to hold.

27
28

1 **REQUEST FOR ADMISSION NO. 2340:**

2 Admit that the design of the iPhone enables it to be portable.

3
4 **REQUEST FOR ADMISSION NO. 2341:**

5 Admit that reading and sending email is fun and easy on the iPad's large screen and almost
6 full-size keyboard.

7
8 **REQUEST FOR ADMISSION NO. 2342:**

9 Admit that encircling the iPhone is a highly finished stainless steel band made of custom
10 alloy that is forged to be five times stronger than standard steel.

11
12 **REQUEST FOR ADMISSION NO. 2343:**

13 Admit that the iPad is thinner and lighter than any laptop or notebook.

14
15 **REQUEST FOR ADMISSION NO. 2344:**

16 Admit that the defining qualities of APPLE's product designs are about ease of use and
17 simplicity.

18
19 **REQUEST FOR ADMISSION NO. 2345:**

20 Admit that the iPhone is made with no fasteners and no battery doors, which enabled
21 APPLE to create a dense and completely sealed design.

22
23 **REQUEST FOR ADMISSION NO. 2346:**

24 Admit that the iPad is made with no fasteners and no battery doors, which enabled APPLE
25 to create a dense and completely sealed design.

1 **REQUEST FOR ADMISSION NO. 2347:**

2 Admit that the iPhone screens were designed to achieve a superior level of scratch
3 resistance.

4
5 **REQUEST FOR ADMISSION NO. 2348:**

6 Admit that the iPad screens were designed to achieve a superior level of scratch resistance.

7
8 **REQUEST FOR ADMISSION NO. 2349:**

9 Admit that the iPhone screens were designed to achieve a superior level of optical clarity.

10
11 **REQUEST FOR ADMISSION NO. 2350:**

12 Admit that the iPad screens were designed to achieve a superior level of optical clarity.

13
14 **REQUEST FOR ADMISSION NO. 2351:**

15 Admit that white models of YOUR iPhone were more challenging to manufacture than
16 YOU originally expected.

17
18 **REQUEST FOR ADMISSION NO. 2352:**

19 Admit that the design of D'790 makes the rounded square features or "icons" more usable.

20
21 **REQUEST FOR ADMISSION NO. 2353:**

22 Admit that the design of D'334 makes the rounded square features or "icons" more usable.

23
24 **REQUEST FOR ADMISSION NO. 2354:**

25 Admit that the design of D'305 makes the rounded square features or "icons" more usable.

26
27 **REQUEST FOR ADMISSION NO. 2355:**

28

1 Admit that YOU have not suffered any actual damages from the trademark dilution claims
2 in the AMENDED COMPLAINT.

3
4 **REQUEST FOR ADMISSION NO. 2356:**

5 Admit that SAMSUNG's conduct as alleged in the AMENDED COMPLAINT has not
6 confused consumers as to the origin of goods or services.

7
8 **REQUEST FOR ADMISSION NO. 2357:**

9 Admit that no consumer has ever claimed to YOU that he or she was confused regarding
10 the origin of SAMSUNG's goods or services.

11
12 **REQUEST FOR ADMISSION NO. 2358:**

13 Admit that no customer has ever claimed to YOU that he or she believed that a
14 SAMSUNG PRODUCT was associated with APPLE.

15
16 **REQUEST FOR ADMISSION NO. 2359:**

17 Admit that no consumer has ever claimed to YOU that he or she purchased a SAMSUNG
18 PRODUCT under the initial belief that it was YOUR product, and then kept that SAMSUNG
19 PRODUCT even after discovering it was not YOUR product.

20
21 **REQUEST FOR ADMISSION NO. 2360:**

22 Admit that no consumer seeking to purchase YOUR products has ever claimed to YOU
23 that he or she was diverted to SAMSUNG PRODUCTS due to the appearance of APPLE
24 TRADEMARKS in SAMSUNG PRODUCTS.

1 **REQUEST FOR ADMISSION NO. 2361:**

2 Admit that no consumer has ever claimed to YOU that he or she would have purchased
3 YOUR products if he or she had not been diverted to mistakenly purchasing SAMSUNG
4 PRODUCTS due to the appearance of APPLE TRADEMARKS in SAMSUNG PRODUCTS.
5

6 **REQUEST FOR ADMISSION NO. 2362:**

7 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
8 origin of goods or services due to a SAMSUNG PRODUCT containing the PHONE HANDSET
9 ICON mark.
10

11 **REQUEST FOR ADMISSION NO. 2363:**

12 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
13 origin of goods or services due to a SAMSUNG PRODUCT containing the MESSAGING ICON
14 mark.
15

16 **REQUEST FOR ADMISSION NO. 2364:**

17 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
18 origin of goods or services due to a SAMSUNG PRODUCT containing the PHOTOS ICON mark.
19

20 **REQUEST FOR ADMISSION NO. 2365:**

21 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
22 origin of goods or services due to a SAMSUNG PRODUCT containing the SETTINGS ICON
23 mark.
24

25 **REQUEST FOR ADMISSION NO. 2366:**

26 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
27 origin of goods or services due to a SAMSUNG PRODUCT containing the NOTES ICON mark.
28

1 **REQUEST FOR ADMISSION NO. 2367:**

2 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
3 origin of goods or services due to a SAMSUNG PRODUCT containing the CONTACTS ICON
4 mark.

5
6 **REQUEST FOR ADMISSION NO. 2368:**

7 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
8 origin of goods or services due to a SAMSUNG PRODUCT containing the ITUNES ICON mark.

9
10 **REQUEST FOR ADMISSION NO. 2369:**

11 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
12 origin of goods or services due to a SAMSUNG PRODUCT containing the ITUNES EIGHTH
13 NOTE mark.

14
15 **REQUEST FOR ADMISSION NO. 2370:**

16 Admit that no consumer seeking to purchase YOUR products has ever claimed to YOU
17 that he or she was diverted to SAMSUNG PRODUCTS due to the appearance of the
18 REGISTERED ICON MARKS in SAMSUNG PRODUCTS.

19
20 **REQUEST FOR ADMISSION NO. 2371:**

21 Admit that no consumer has ever claimed to YOU that he or she would have purchased
22 YOUR products if he or she had not been diverted to SAMSUNG PRODUCTS due to the
23 appearance of the REGISTERED ICON MARKS in SAMSUNG PRODUCTS.

24
25 **REQUEST FOR ADMISSION NO. 2372:**

26 Admit that no consumer has ever claimed to YOU that he or she was confused as to the
27 origin of goods or services due to SAMSUNG's use of the REGISTERED ICON MARKS in
28 SAMSUNG PRODUCTS.

1 **REQUEST FOR ADMISSION NO. 2373:**

2 Admit that YOU have no evidence of actual confusion between SAMSUNG PRODUCTS
3 and APPLE products.
4

5 **REQUEST FOR ADMISSION NO. 2374:**

6 Admit that MOBILE PHONE DEVICE consumers are sophisticated purchasers.
7

8 **REQUEST FOR ADMISSION NO. 2375:**

9 Admit that YOU do not have trademark or ownership rights in the image of a phone
10 handset standing alone.
11

12 **REQUEST FOR ADMISSION NO. 2376:**

13 Admit that SAMSUNG products are marked with the word “Samsung.”
14

15 **REQUEST FOR ADMISSION NO. 2377:**

16 Admit that YOU have not suffered injury as a result of SAMSUNG’s alleged unfair
17 competition.
18

19 **REQUEST FOR ADMISSION NO. 2378:**

20 Admit that YOU have not lost money as a result of SAMSUNG’s alleged unfair
21 competition.
22

23 **REQUEST FOR ADMISSION NO. 2379:**

24 Admit that YOU control a greater share of the MOBILE PHONE DEVICE market than
25 SAMSUNG.
26
27
28

1 **REQUEST FOR ADMISSION NO. 2380:**

2 Admit that YOU have no consumer survey evidence of ANY alleged secondary meaning
3 in the REGISTERED ICON MARKS.
4

5 **REQUEST FOR ADMISSION NO. 2381:**

6 Admit that YOU have no consumer survey evidence of the alleged strength of the
7 REGISTERED ICON MARKS.
8

9 **REQUEST FOR ADMISSION NO. 2382:**

10 Admit that YOU have no consumer survey evidence of ANY alleged likelihood of
11 confusion regarding the REGISTERED ICON MARKS as a result of SAMSUNG's alleged use of
12 the REGISTERED ICON MARKS.
13

14 **REQUEST FOR ADMISSION NO. 2383:**

15 Admit that YOU are not aware of any individual or entity who did not use YOUR products
16 as a result of ANY of SAMSUNG's conduct that is the subject of YOUR AMENDED
17 COMPLAINT in This Lawsuit.
18

19 **REQUEST FOR ADMISSION NO. 2384:**

20 Admit that YOU have no consumer survey evidence of ANY alleged likelihood of dilution
21 regarding the REGISTERED ICON MARKS as a result of SAMSUNG's alleged use of the
22 REGISTERED ICON MARKS.
23

24 **REQUEST FOR ADMISSION NO. 2385:**

25 Admit that YOU have no consumer survey evidence of ANY alleged likelihood of dilution
26 regarding the REGISTERED ICON MARKS as a result of SAMSUNG's alleged use of the
27 REGISTERED ICON MARKS.
28

1 **REQUEST FOR ADMISSION NO. 2386:**

2 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
3 PRODUCTS can serve to focus a user’s attention on the screen or product.

4
5 **REQUEST FOR ADMISSION NO. 2387:**

6 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
7 PRODUCTS can make the screen more accessible.

8
9 **REQUEST FOR ADMISSION NO. 2388:**

10 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
11 PRODUCTS can make YOUR PRODUCTS more accessible.

12
13 **REQUEST FOR ADMISSION NO. 2389:**

14 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
15 PRODUCTS can make the screen easier to use.

16
17 **REQUEST FOR ADMISSION NO. 2390:**

18 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
19 PRODUCTS can make YOUR PRODUCTS easier to use.

20
21 **REQUEST FOR ADMISSION NO. 2391:**

22 Admit that the lack of ornamentation on the rectangular front surface or “screen” in YOUR
23 PRODUCTS can make YOUR PRODUCTS less technically intimidating than previously
24 available smart phones and portable electronic devices.

25
26
27 **REQUEST FOR ADMISSION NO. 2392:**

28

1 Admit that the Bluebird Pidion BM-200 was known or used by others in the United States
2 before April 20, 2006.

3

4 **REQUEST FOR ADMISSION NO. 2393:**

5 Admit that the Bluebird Pidion BM-200 was offered for sale in the United States before
6 July 30, 2006.

7

8 **REQUEST FOR ADMISSION NO. 2394:**

9 Admit that the Bluebird Pidion BM-200 was sold in the United States before July 30, 2006.
10

11 **REQUEST FOR ADMISSION NO. 2395:**

12 Admit that the Bluebird Pidion BM-200 was in public use in the United States before July
13 30, 2006.

14

15 **REQUEST FOR ADMISSION NO. 2396:**

16 Admit that the design of the Bluebird Pidion BM-200 was patented in Korea before July
17 30, 2006.

18

19 **REQUEST FOR ADMISSION NO. 2397:**

20 Admit that the design of the Bluebird Pidion BM-200 was patented in Korea before April
21 20, 2006.

22

23

24 **REQUEST FOR ADMISSION NO. 2398:**

25 Admit that the design for the Bluebird Pidion BM-200 is shown in Korean design patent
26 0398307.

27

28 **REQUEST FOR ADMISSION NO. 2399:**

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Admit that Korean design patent 0398307 issued before July 30, 2006.

REQUEST FOR ADMISSION NO. 2400:

Admit that Korean design patent 0398307 issued before April 20, 2006.

REQUEST FOR ADMISSION NO. 2401:

Admit that the Bluebird Pidion BM-200 is a rectangular phone with four evenly rounded corners.

REQUEST FOR ADMISSION NO. 2402:

Admit that the Bluebird Pidion BM-200 has a flat surface covering the front of the product.

REQUEST FOR ADMISSION NO. 2403:

Admit that the Bluebird Pidion BM-200 has the appearance of a bezel around the flat surface.

REQUEST FOR ADMISSION NO. 2404:

Admit that the Bluebird Pidion BM-200 has a clear surface over the display screen.

REQUEST FOR ADMISSION NO. 2405:

Admit that the black version of the Bluebird Pidion BM-200 has substantial black borders above and below the display screen and narrower black borders on either side of the screen.

REQUEST FOR ADMISSION NO. 2406:

Admit that the white version of the Bluebird Pidion BM-200 has substantial white borders above and below the display screen and narrower white borders on either side of the screen.

1 **REQUEST FOR ADMISSION NO. 2407:**

2 Admit that the Bluebird Pidion BM-200 has a rounded, horizontally-oriented and
3 horizontally-centered speaker slot.

4
5 **REQUEST FOR ADMISSION NO. 2408:**

6 Admit that when the Bluebird Pidion BM-200 is on, it displays a matrix of colorful icons
7 arranged in a grid pattern.

8
9 **REQUEST FOR ADMISSION NO. 2409:**

10 Admit that the external hardware design of the Bluebird Pidion BM-200 is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

12
13 **REQUEST FOR ADMISSION NO. 2410:**

14 Admit that the external hardware design of the black version of the Bluebird Pidion BM-
15 200 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

16
17 **REQUEST FOR ADMISSION NO. 2411:**

18 Admit that the external hardware design of the Bluebird Pidion BM-200 is
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

20
21 **REQUEST FOR ADMISSION NO. 2412:**

22 Admit that the external hardware design of the Bluebird Pidion BM-200 is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

24
25 **REQUEST FOR ADMISSION NO. 2413:**

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28

1 Admit that the external hardware design of the black version of the Bluebird Pidion BM-
2 200 is not SUBSTANTIALLY THE SAME as the design shown in United States Patent
3 D593,087.

4
5 **REQUEST FOR ADMISSION NO. 2414:**

6 Admit that the external hardware design of the Bluebird Pidion BM-200 is not
7 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.

8
9 **REQUEST FOR ADMISSION NO. 2415:**

10 Admit that the LG Chocolate was known in the United States before April 20, 2006.

11
12 **REQUEST FOR ADMISSION NO. 2416:**

13 Admit that the LG Chocolate was known in the United States by March 2006.

14
15 **REQUEST FOR ADMISSION NO. 2417:**

16 Admit that the LG Chocolate was used by others in the United States before April 20,
17 2006.

18
19 **REQUEST FOR ADMISSION NO. 2418:**

20 Admit that the LG Chocolate is a rectangular phone with four evenly rounded corners.

21
22 **REQUEST FOR ADMISSION NO. 2419:**

23 Admit that the LG Chocolate has a flat surface covering the front of the product.

24
25 **REQUEST FOR ADMISSION NO. 2420:**

26 Admit that the LG Chocolate has a clear surface over the display screen.
27
28

1 **REQUEST FOR ADMISSION NO. 2421:**

2 Admit that the LG Chocolate has substantial black borders above and below the display
3 screen and narrower black borders on either side of the screen.
4

5 **REQUEST FOR ADMISSION NO. 2422:**

6 Admit that the LG Chocolate has a rounded, horizontally-oriented and horizontally-
7 centered speaker slot.
8

9 **REQUEST FOR ADMISSION NO. 2423:**

10 Admit that the external hardware design of the LG Chocolate is SUBSTANTIALLY THE
11 SAME as the design shown in United States Patent D618,677.
12

13 **REQUEST FOR ADMISSION NO. 2424:**

14 Admit that the external hardware design of the LG Chocolate is not SUBSTANTIALLY
15 THE SAME as the design shown in United States Patent D618,677.
16

17 **REQUEST FOR ADMISSION NO. 2425:**

18 Admit that the external hardware design of the LG Chocolate is SUBSTANTIALLY THE
19 SAME as the design shown in United States Patent D593,087.
20

21 **REQUEST FOR ADMISSION NO. 2426:**

22 Admit that the external hardware design of the LG Chocolate is not SUBSTANTIALLY
23 THE SAME as the design shown in United States Patent D593,087.
24

25 **REQUEST FOR ADMISSION NO. 2427:**

26 Admit that the external hardware design of the LG Chocolate is SUBSTANTIALLY THE
27 SAME as the design shown in United States Patent D622,270.
28

1 **REQUEST FOR ADMISSION NO. 2428:**

2 Admit that the external hardware design of the LG Chocolate is not SUBSTANTIALLY
3 THE SAME as the design shown in United States Patent D622,270.
4
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6

7 **REQUEST FOR ADMISSION NO. 2429:**

8 Admit that the design of the LG Prada (also called the LG KE850) was known by others in
9 this country before April 20, 2006.
10

11 **REQUEST FOR ADMISSION NO. 2430:**

12 Admit that the design of the LG Prada was used by others in this country before April 20,
13 2006.
14

15 **REQUEST FOR ADMISSION NO. 2431:**

16 Admit that the design of the LG Prada was known to YOU before April 20, 2006.
17

18 **REQUEST FOR ADMISSION NO. 2432:**

19 Admit that images of the LG Prada were publicly available on the Internet by December
20 2006.
21

22 **REQUEST FOR ADMISSION NO. 2433:**

23 Admit that the LG Prada is a rectangular phone with four evenly rounded corners.
24
25

26 **REQUEST FOR ADMISSION NO. 2434:**

27 Admit that the LG Prada has a flat surface covering the front of the product.
28

1 **REQUEST FOR ADMISSION NO. 2435:**

2 Admit that the LG Prada has the appearance of a metallic bezel around the flat surface.

4 **REQUEST FOR ADMISSION NO. 2436:**

5 Admit that the LG Prada has a clear surface over the display screen.

7 **REQUEST FOR ADMISSION NO. 2437:**

8 Admit that the LG Prada has substantial black borders above and below the display screen
9 and narrower black borders on either side of the screen.

11 **REQUEST FOR ADMISSION NO. 2438:**

12 Admit that the LG Prada has a rounded, horizontally-oriented and horizontally-centered
13 speaker slot.

15 **REQUEST FOR ADMISSION NO. 2439:**

16 Admit that the when the LG Prada is on, it displays a matrix of colorful icons .

18 **REQUEST FOR ADMISSION NO. 2440:**

19 Admit that the external hardware design of the LG Prada is SUBSTANTIALLY THE
20 SAME as the design shown in United States Patent D618,677.

22 **REQUEST FOR ADMISSION NO. 2441:**

23 Admit that the external hardware design of the LG Prada is SUBSTANTIALLY THE
24 SAME as the design shown in United States Patent D593,087.

26 **REQUEST FOR ADMISSION NO. 2442:**

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28

1 Admit that the external hardware design of the LG Prada is SUBSTANTIALLY THE
2 SAME as the design shown in United States Patent D622,270.

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4
5 **REQUEST FOR ADMISSION NO. 2443:**

6 Admit that Sharp's Japanese design registration 124638 was issued before April 20, 2006.

7
8 **REQUEST FOR ADMISSION NO. 2444:**

9 Admit that Sharp's Japanese design registration 124638 was known in the United States
10 before April 20 2006.

11
12 **REQUEST FOR ADMISSION NO. 2445:**

13 Admit that the design in Sharp's Japanese design registration 124638 shows a rectangular
14 phone with four evenly rounded corners.

15
16 **REQUEST FOR ADMISSION NO. 2446:**

17 Admit that the design in Sharp's Japanese design registration 124638 has a bezel around
18 the front surface of the phone.

19
20 **REQUEST FOR ADMISSION NO. 2447:**

21 Admit that the design in Sharp's Japanese design registration 124638 has more substantial
22 borders above and below the display screen and narrower borders on either side of the screen.

23
24
25 **REQUEST FOR ADMISSION NO. 2448:**

26 Admit that the design in Sharp's Japanese design registration 124638 has a rounded,
27 horizontally-oriented, and horizontally-centered speaker slot.

1 **REQUEST FOR ADMISSION NO. 2449:**

2 Admit that the design in Sharp's Japanese design registration 124638 has a display screen
3 centered on the front surface.

4
5 **REQUEST FOR ADMISSION NO. 2450:**

6 Admit that the design in Sharp's Japanese design registration 124638 lacks significant
7 ornamentation.

8
9 **REQUEST FOR ADMISSION NO. 2451:**

10 Admit that the design shown in Sharp's Japanese design registration 124638 is
11 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

12
13 **REQUEST FOR ADMISSION NO. 2452:**

14 Admit that the design shown in Sharp's Japanese design registration 124638 is not
15 SUBSTANTIALLY THE SAME as the design shown in United States Patent D618,677.

16
17 **REQUEST FOR ADMISSION NO. 2453:**

18 Admit that the design shown in Sharp's Japanese design registration 124638 is
19 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

20
21 **REQUEST FOR ADMISSION NO. 2454:**

22 Admit that the design shown in Sharp's Japanese design registration 124638 is not
23 SUBSTANTIALLY THE SAME as the design shown in United States Patent D593,087.

24
25 **REQUEST FOR ADMISSION NO. 2455:**

26 Admit that the design in Sharp's Japanese design registration 124638 is
27 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
28

1 **REQUEST FOR ADMISSION NO. 2456:**

2 Admit that the design in Sharp's Japanese design registration 124638 is not
3 SUBSTANTIALLY THE SAME as the design shown in United States Patent D622,270.
4
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6 **REQUEST FOR ADMISSION NO. 2457:**

7 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
8 a tablet device with an overall rectangular shape with four evenly rounded corners.
9

10 **REQUEST FOR ADMISSION NO. 2458:**

11 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
12 a tablet device with a flat, clear surface on the front of the device.
13

14 **REQUEST FOR ADMISSION NO. 2459:**

15 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
16 a tablet device with a rim that surrounded the front surface of the device.
17

18 **REQUEST FOR ADMISSION NO. 2460:**

19 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
20 a tablet device with a substantially flat back panel that rounds up near the edges to form the rim
21 around the front surface.
22

23 **REQUEST FOR ADMISSION NO. 2461:**

24 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
25 a tablet device with a thin form factor.
26
27

28 **REQUEST FOR ADMISSION NO. 2462:**

1 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
2 a tablet device that was SUBSTANTIALLY THE SAME as the design shown in United States
3 Patent D504,889.

4
5 **REQUEST FOR ADMISSION NO. 2463:**

6 Admit that in 1994, publisher Knight-Ridder produced and distributed a video that showed
7 a tablet device that was not SUBSTANTIALLY THE SAME as the design shown in United States
8 Patent D504,889.

9
10
11 **REQUEST FOR ADMISSION NO. 2464:**

12 Admit that the HP Compaq Tablet PC TC 1000 was known in this country before
13 September 3, 2003.

14
15 **REQUEST FOR ADMISSION NO. 2465:**

16 Admit that the HP Compaq Tablet PC TC 1000 was in public use in this country before
17 September 3, 2003.

18
19 **REQUEST FOR ADMISSION NO. 2466:**

20 Admit that the HP Compaq Tablet PC TC 1000 was on sale in this country before
21 September 3, 2003.

22
23 **REQUEST FOR ADMISSION NO. 2467:**

24 Admit that the HP Compaq Tablet PC TC 1000 was sold in this country before September
25 3, 2003.

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28 **REQUEST FOR ADMISSION NO. 2468:**

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Admit that the HP Compaq Tablet PC TC 1000 was publicly announced in 2002.

REQUEST FOR ADMISSION NO. 2469:

Admit that the HP Compaq Tablet PC TC 1000 has an overall rectangular shape with four evenly rounded corners.

REQUEST FOR ADMISSION NO. 2470:

Admit that the HP Compaq Tablet PC TC 1000 has a flat, clear surface covering the front of the device.

REQUEST FOR ADMISSION NO. 2471:

Admit that the HP Compaq Tablet PC TC 1000 has a thin rim that surrounds the cover glass on the front surface of the device.

REQUEST FOR ADMISSION NO. 2472:

Admit that the HP Compaq Tablet PC TC 1000 has a substantially flat back panel that rounds up near the edges to form the rim around the front surface.

REQUEST FOR ADMISSION NO. 2473:

Admit that the HP Compaq Tablet PC TC 1000 has a thin form factor.

REQUEST FOR ADMISSION NO. 2474:

Admit that the external hardware design of the HP Compaq Tablet PC TC 1000 is SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

REQUEST FOR ADMISSION NO. 2475:

1 Admit that the external hardware design of the HP Compaq Tablet PC TC 1000 is not
2 SUBSTANTIALLY THE SAME as the design shown in United States Patent D504,889.

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4
5 **REQUEST FOR ADMISSION NO. 2476:**

6 Admit that the application for United States Patent D497,364 was filed before September
7 3, 2003.

8
9 **REQUEST FOR ADMISSION NO. 2477:**

10 Admit that the application for United States Patent D497,364 was filed on November 27,
11 2002.

12
13 **REQUEST FOR ADMISSION NO. 2478:**

14 Admit that the design shown in United States Patent D497,364 has an overall rectangular
15 shape with four evenly rounded corners.

16
17 **REQUEST FOR ADMISSION NO. 2479:**

18 Admit that the design shown in United States Patent D497,364 has a flat surface covering
19 the front of the device.

20
21 **REQUEST FOR ADMISSION NO. 2480:**

22 Admit that the front surface of the design shown in United States Patent D497,364 has no
23 ornamentation.

24
25 **REQUEST FOR ADMISSION NO. 2481:**

26 Admit that the design shown in United States Patent D497,364 has a thin rim that
27 surrounds the front surface of the device.
28

1 **REQUEST FOR ADMISSION NO. 2482:**

2 Admit that the design shown in United States Patent D497,364 has a substantially flat back
3 panel.

4
5 **REQUEST FOR ADMISSION NO. 2483:**

6 Admit that the design shown in United States Patent D497,364 has a thin form factor.

7
8 **REQUEST FOR ADMISSION NO. 2484:**

9 Admit that the design shown in United States Patent D497,364 is SUBSTANTIALLY
10 THE SAME as the design shown in United States Patent D504,889.

11
12 **REQUEST FOR ADMISSION NO. 2485:**

13 Admit that the design shown in United States Patent D497,364 is not SUBSTANTIALLY
14 THE SAME as the design shown in United States Patent D504,889.

15
16 **REQUEST FOR ADMISSION NO. 2486:**

17 Admit that the BlackBerry 7130g was known or used by others in the United States before
18 June 23, 2007.

19
20
21 **REQUEST FOR ADMISSION NO. 2487:**

22 Admit that when turned on, the BlackBerry 7130g displays a colorful matrix of icons.

23
24 **REQUEST FOR ADMISSION NO. 2488:**

25 Admit that the matrix of icons displayed by the BlackBerry 7130g is comprised of three
26 rows and four columns.

27
28 **REQUEST FOR ADMISSION NO. 2489:**

1 Admit that the matrix of icons displayed by the BlackBerry 7130g is SUBSTANTIALLY
2 THE SAME as the design shown in United States Patent D627,790.

3
4 **REQUEST FOR ADMISSION NO. 2490:**

5 Admit that the matrix of icons displayed by the BlackBerry 7130g is SUBSTANTIALLY
6 THE SAME as the design shown in United States Patent D604,305.

7
8 **REQUEST FOR ADMISSION NO. 2491:**

9 Admit that the matrix of icons displayed by the BlackBerry 7130g is SUBSTANTIALLY
10 THE SAME as the design shown in United States Patent D617,334.

11
12 **REQUEST FOR ADMISSION NO. 2492:**

13 Admit that the matrix of icons displayed by the BlackBerry 7130g is not
14 SUBSTANTIALLY THE SAME as the design shown in United States Patent D627,790.

15
16 **REQUEST FOR ADMISSION NO. 2493:**

17 Admit that the matrix of icons displayed by the BlackBerry 7130g is not
18 SUBSTANTIALLY THE SAME as the design shown in United States Patent D604,305.

19
20 **REQUEST FOR ADMISSION NO. 2494:**

21 Admit that the matrix of icons displayed by the BlackBerry 7130g is not
22 SUBSTANTIALLY THE SAME as the design shown in United States Patent D617,334.

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25
26 **REQUEST FOR ADMISSION NO. 2495:**

27 Admit that Mac OS X Tiger version 10.4.3 was offered for sale before June 23, 2006.
28

1 **REQUEST FOR ADMISSION NO. 2496:**

2 Admit that the Dashboard feature of Mac OS X Tiger version 10.4.3 can display a dock at
3 the bottom of the screen that can contain a row of icons.

4
5 **REQUEST FOR ADMISSION NO. 2497:**

6 Admit that the Dashboard feature of Mac OS X Tiger version 10.4.3 displays square icons
7 with rounded corners.

8
9 **REQUEST FOR ADMISSION NO. 2498:**

10 Admit that the Settings icon displayed in the Dashboard feature of Mac OS X Tiger
11 version 10.4.3 is identical in appearance, except for size, to the icon labeled "Settings" in the
12 design shown in United States Patent D604,305.

13
14 **REQUEST FOR ADMISSION NO. 2499:**

15 Admit that the Settings icon displayed in the Dashboard feature of Mac OS X Tiger
16 version 10.4.3 is identical in appearance, except for size, to the icon labeled "Settings" in the
17 design shown in United States Patent D617,334.

18
19 **REQUEST FOR ADMISSION NO. 2500:**

20 Admit that YOU did not disclose Mac OS X Tiger version 10.4.3 to the United States
21 Patent Office during the prosecution of United States Patent D617,334.

22
23 **REQUEST FOR ADMISSION NO. 2501:**

24 Admit that YOU did not disclose Mac OS X Tiger version 10.4.3 to the United States
25 Patent Office during the prosecution of United States Patent D604,305.

26
27 **REQUEST FOR ADMISSION NO. 2502:**

1 Admit that YOU did not disclose Mac OS X Tiger version 10.4.3 to the United States
2 Patent Office during the prosecution of United States Patent 627,790.

3
4
5 **REQUEST FOR ADMISSION NO. 2503:**

6 Admit that mobile phone devices with black faces were known or used by others in this
7 country prior to April 20, 2006.

8 **REQUEST FOR ADMISSION NO. 2504:**

9 Admit that rectangular-shaped mobile phone devices with four evenly rounded corners
10 were known or used by others in this country prior to April 20, 2006.

11 **REQUEST FOR ADMISSION NO. 2505:**

12 Admit that rectangular-shaped mobile phone devices with four evenly rounded corners
13 were known or used by others in this country prior to April 20, 2006.

14 **REQUEST FOR ADMISSION NO. 2506:**

15 Admit that mobile phone devices with a flat, clear surface covering the front of the phone
16 were known or used by others in this country prior to April 20, 2006.

17 **REQUEST FOR ADMISSION NO. 2507:**

18 Admit that mobile phone devices with metallic bezels were known or used by others in this
19 country prior to April 20, 2006.

20 **REQUEST FOR ADMISSION NO. 2508:**

21 Admit that mobile phone devices with a clear surface over the display screen were known
22 or used by others in this country prior to April 20, 2006.

23 **REQUEST FOR ADMISSION NO. 2509:**

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1 Admit that mobile phone devices with substantial borders above and below the display
2 screen and narrower borders on either side of the screen were known or used by others in this
3 country prior to April 20, 2006.

4 **REQUEST FOR ADMISSION NO. 2510:**

5 Admit that mobile phone devices with a rounded, horizontally-oriented and horizontally-
6 centered speaker slot were known or used by others in this country prior to April 20, 2006.

7 **REQUEST FOR ADMISSION NO. 2511:**

8 Admit that mobile phone devices that displayed a matrix of colorful square icons with
9 rounded corners when turned on were known or used by others in this country prior to April 20,
10 2006.
11

12 **REQUEST FOR ADMISSION NO. 2512:**

13 Admit that YOU represented on February 9, 2009 that:

14
15 Users often find that it is difficult to navigate to a particular UI element or window, or
16 to even locate a desired element, among a large number of onscreen elements. The
17 problem is further compounded when user interfaces allow users to position the
18 onscreen elements in any desired arrangement, including overlapping, minimizing,
19 maximizing, and the like. Such flexibility may be useful to some users but may result
20 in chaos for other users. Having too many items on the screen simultaneously leads to
21 information overload, and can act as an inhibiting factor in the effective use of the
22 computer equipment.
23

24 **REQUEST FOR ADMISSION NO. 2513:**

25 Admit that YOU represented on February 9, 2009 that:
26
27
28

1 Some user interfaces dedicate certain areas of the screen for holding certain
2 user interface elements that are commonly used (such as a menu bar, or icons that
3 activate commonly-used program files). However, such areas are generally limited in
4 size, so as not to occupy too much valuable screen real estate that could otherwise be
5 devoted to the main workspace are of the display screen. Although small elements,
6 such as a digital clock element or taskbar, may be well suited for display in such
7 dedicated screen areas, other types of elements cannot be useably presented in such a
8 small screen area; thus they must be activated, or enlarged, before they can be used or
9 viewed. This causes yet another level of confusion, since the items need to be
10 activated and dismissed. Furthermore, the items may overlap or otherwise add to the
11 number of onscreen elements that must be dealt with and organized by the user.
12

13 These problems cause many users to fail to use their computers to their full
14 potential, and can further result in frustration or confusion, particularly in novice users.
15

16 What is needed is a mechanism for providing easy access to commonly used
17 user interface elements, without introducing additional clutter or confusion. What is
18 further needed is a mechanism for providing such access in a user-configurable
19 manner that allows the user to activate and dismiss the UI elements at will and with a
20 minimum of confusion. What is further needed is a mechanism that allows users to
21 easily activate and dismiss certain user interface elements regardless of the number of
22 open windows currently on the user's screen, and without requiring the user to search
23 for particular user interface elements among a set of open windows.
24

25 What is further needed is a mechanism for addressing the above-stated problems in a
26 convenient, easy-to-use manner that is likely to be readily adopted by users, and that
27 fits within the framework of existing graphical user interfaces.
28

1 **REQUEST FOR ADMISSION NO. 2514:**

2 Admit that YOU represented on July 12, 2002 that:

3 [F]or computer systems having relatively small cursor control devices, such as
4 portable computers which employ a small trackball, lengthy cursor movements can
5 prove to be cumbersome. Therefore, it is desirable to provide a graphical user interface
6 which makes it easier for users to discover the commands that are appropriate in a
7 given context, as well as give the user a more efficient means for quickly executing the
8 commands.
9

10 **REQUEST FOR ADMISSION NO. 2515:**

11 Admit that YOU represented on August 22, 2007 that the bezel on the original iPhone
12 enhances the structural integrity of the phone.
13

14 **REQUEST FOR ADMISSION NO. 2516:**

15 Admit that YOU represented on August 22, 2007 that the bezel on the original iPhone
16 makes the phone "more rigid along its length than would be possible if no bezel were used."
17

18 **REQUEST FOR ADMISSION NO. 2517:**

19 Admit that YOU represented on August 22, 2007 that the bezel of the original iPhone
20 prevents damage to the display, for example by shielding the display from impact in the event that
21 the phone is dropped.

22 **REQUEST FOR ADMISSION NO. 2518:**

23 Admit that YOU represented on January 26, 2010 that:

24 The trend of smaller, lighter and powerful presents a continuing design
25 challenge in the design of some components of the portable computing devices.

26 One design challenge associated with the portable computing device is the
27 design of the enclosures used to house the various internal components. This design
28

1 challenge generally arises from a number conflicting design goals that includes the
2 desirability of making the enclosure lighter and thinner, the desirability of making the
3 enclosure stronger and making the enclosure more esthetically pleasing. The lighter
4 enclosures, which typically use thinner plastic structures and fewer fasteners, tend to
5 be more flexible and therefore they have a greater propensity to buckle and bow when
6 used while the stronger and more rigid enclosures, which typically use thicker plastic
7 structures and more fasteners, tend to be thicker and carry more weight.
8 Unfortunately, however, the increased weight consistent with the more rugged
9 enclosure can lead to user dissatisfaction whereas bowing of enclosures formed of
10 lightweight material can result in damaging some of the internal components (such as
11 printed circuit boards) of the portable device.
12
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17 DATED: February 7, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

20 By /s/ Victoria F. Maroulis

21 Charles K. Verhoeven

22 Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 7, 2012, I caused **SAMSUNG'S FIFTH SET OF**
3 **REQUESTS FOR ADMISSION TO APPLE INC.** to be electronically served on the following
4 via email:

5 **ATTORNEYS FOR APPLE INC.**

6 AppleMoFo@mofo.com
7 WHAppleSamsungNDCalService@wilmerhale.com

8 HAROLD J. MCELHINNY
9 hmcclhinny@mofo.com

10 MICHAEL A. JACOBS
11 mjacobs@mofo.com

12 JENNIFER LEE TAYLOR
13 jtaylor@mofo.com

14 ALISON M. TUCHER
15 atucher@mofo.com

16 RICHARD S.J. HUNG
17 rhung@mofo.com

18 JASON R. BARTLETT
19 jasonbartlett@mofo.com

20 MORRISON & FOERSTER LLP
21 425 Market Street
22 San Francisco, California 94105-2482
23 Telephone: (415) 268-7000
24 Facsimile: (415) 268-7522

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

MARK D. SELWYN
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

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I declare under penalty of perjury that the foregoing is true and correct. Executed in
Redwood Shores, California on February 7, 2012.

/s/ Brett Arnold