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 14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 16

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 19

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

26 Defendant.
 27

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF ALEXANDER B.
 BINDER IN SUPPORT OF SAMSUNG'S
 OPPOSITION TO APPLE'S MOTION TO
 COMPEL**

Date: March 6, 2012
 Time: 10:00 a.m.
 Place: Courtroom 5, 4th Floor
 Judge: Hon. Paul S. Grewal

DECLARATION OF ALEXANDER B. BINDER

I, Alexander B. Binder, declare as follows:

1. I am a member of the bar of the State of California and an associate with Quinn Emanuel Urquhart & Sullivan LLP, attorneys for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively, “Samsung”). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Samsung has invested significant time and resources into complying with the Court’s three-day deadline for production of documents in advance of related depositions. Samsung has hired teams of full-time English and Korean-speaking attorneys to review Samsung’s document collection in advance of the numerous depositions Apple has noticed.

3. Samsung has produced documents at least three days in advance of the vast majority of Samsung depositions to date, as illustrated by the numerous examples in the chart below:

Samsung Witness	Deposition Date	Production Date(s)	Number of Days Samsung’s Production Preceded the Deposition
Himke Vandervelde	Nov. 2, 2011	Oct. 28, 2011 Oct. 30, 2011 Feb. 1, 2012	5 3
Gert-Jan Vanlieshout	Nov. 4, 2011	Oct. 28, 2011 Oct. 29, 2011 Oct. 30, 2011 Nov. 17, 2011 Feb. 1, 2012	7 6 5
Young Bum Kim	Nov. 11, 2011	Nov. 6, 2011	6
Seong Hun Kim	Nov. 11, 2011	Oct. 29, 2011 Nov. 6, 2011 Nov. 9, 2011	13 7 2
Hyun Woo Lee	Nov. 13, 2011	Nov. 8, 2011	5
Soon Jae Choi	Nov. 16, 2011	Nov. 11, 2011	5
Moon Sang Jeong	Nov. 17, 2011	Nov. 11, 2011	6
Sang Ryul Park	Nov. 18, 2011	Nov. 9, 2011	9
Jae Yeol Kim	Nov. 18, 2011	Nov. 10, 2011 Nov. 13, 2011	8 6
Yong Yun Kwak	Nov. 23, 2011	Nov. 17, 2011	7
Chang Soo Park	Nov. 30, 2011	Nov. 23, 2011	8
Hun Kee Kim	Nov. 30, 2011	Nov. 13, 2011 Nov. 17, 2011	17 13

	Samsung Witness	Deposition Date	Production Date(s)	Number of Days Samsung's Production Preceded the Deposition
1				
2				
3	Joon Young Cho	Nov. 30, 2011	Nov. 25, 2011	5
4	Noh-Sun Kim	Dec. 3, 2011	Nov. 17, 2011	15
5	Juho Lee	Dec. 3, 2011	Nov. 29, 2011 Dec. 1, 2011	5 2
6	Jae Seung Yoon	Dec. 3, 2011	Nov. 25, 2011 Dec. 1, 2011	9 2
7	Min Goo Kim	Dec. 12, 2011	Nov. 13, 2011 Nov. 23, 2011	29 20
8	Bo Ra Kim	Jan. 11, 2012	Sept. 16, 2011 Sept. 17, 2011 Dec. 29, 2011 Dec. 30, 2011 Jan. 7, 2012	117 116 14 12 4
9	Ahyoung Kim	Jan. 11, 2012	Oct. 7, 2011 Oct. 7, 2011 Jan. 8, 2011 Jan. 9, 2011 Jan. 9, 2011 Jan. 11, 2011	96 96 3 2 1 0
10	Woogyun Kho	Jan. 12, 2012	Oct. 10, 2011 Jan. 1, 2012 Jan. 6, 2012	94 11 6
11	Na Ra Cho	Jan. 14, 2012	Jan. 10, 2012	4
12	Junho Park	Jan. 14, 2012	Sept. 12, 2011 Jan. 11, 2012 Jan. 12, 2012	134 3 2
13	Tim Sheppard	Jan. 24, 2012	Jan. 18, 2012 Jan. 19, 2012	6 4
14	Justin Denison	Jan. 25, 2012	Jan. 20, 2012 Jan. 20, 2012	5 5
15	Brian Rosenberg	Jan. 26, 2012	Jan. 21, 2012 Jan. 21, 2012	5 5
16	Jaegwan Shin	Jan. 24, 2012	Dec. 21, 2012 Dec. 23, 2011	37 35
17	Qi Ling	Feb. 1, 2012	Oct. 7, 2011 Dec. 30, 2011	117 28
18	Jeeyeun Wang	Feb. 2, 2012	Oct. 7, 2011 Jan. 13, 2012 Jan. 24, 2012	118 18 7
19	Jinsoo Kim	Feb. 2, 2012	Sept. 12, 2011 Sept. 16, 2011 Dec. 14, 2011 Dec. 29, 2011 Dec. 31, 2011 Jan. 5, 2012 Jan. 23, 2012	143 139 50 36 33 26 10
20	Jung Min Yeo	Feb. 2, 2012	Sept. 20, 2011 Jan. 7, 2012 Jan. 22, 2012	135 26 11
21	YoungSoon Lee	Feb. 7, 2012	Feb. 4, 2012	3
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Samsung Witness	Deposition Date	Production Date(s)	Number of Days Samsung's Production Preceded the Deposition
Sun-Young Yi	Feb. 8, 2012	Dec. 30, 2011 Jan. 31, 2012	42 8
Hangil Song	Feb. 8, 2012	Dec. 30, 2011	41
KiHyung Nam	Feb. 10, 2012	Dec. 31, 2011 Jan. 30, 2012	42 11
Ioi Lam	Feb. 10, 2012	Oct. 7, 2011 Dec. 30, 2011	102 43
Min Kyoung Kim	Feb. 10, 2012	Dec. 29, 2011 Dec. 31, 2011 Feb. 5, 2012	45 42 5
Seongwoo Kim	Feb. 13, 2012	Feb. 7, 2012	6
Beong Wook Kim	Feb. 15, 2012	Feb. 2, 2012	13
Giyoung Lee	Feb. 17, 2012	Sept. 12, 2011 Sept. 16, 2011 Dec. 29, 2011 Feb. 5, 2012	158 162 51 12
DooJu Byun	Feb. 17, 2012	Oct. 8, 2011 Dec. 7, 2011 Dec. 31, 2011	152 73 49
Young Seok Bang	Feb. 17, 2012	Sept. 12, 2011 Sept. 16, 2011 Dec. 14, 2011 Dec. 31, 2011 Feb. 6, 2012	158 154 65 48 10
Tim Benner	Feb. 22, 2012	Dec. 30, 2011 Dec. 31, 2011 Jan. 5, 2012 Jan. 16, 2012	54 53 48 37
Yunjung Lee	Feb. 23, 2012	Oct. 8, 2011 Dec. 7, 2011 Dec. 30, 2011 Jan. 7, 2012 Feb. 8, 2012	138 78 56 49 15
Dongseok Rvu	Feb. 29, 2012	Jan. 13, 2012	47
Minhyouk Lee	Feb. 29, 2012	Oct. 8, 2011 Dec. 14, 2011 Dec. 30, 2011 Feb. 9, 2012	170 77 62 20
Byeong Wook Kim	Feb. 15, 2012	Feb. 10, 2012	5
Don Ju Lee	Feb. 17, 2012	Feb. 11, 2012	6
Seong Ho Choi	Feb. 19, 2012	Feb. 14, 2012	5
Sang Hung	Date TBD	Dec. 31, 2011	N/A
Heon Seok Lee	Date TBD	Feb. 5, 2012	N/A

4. In the few instances where documents were produced less than three days in advance of the deposition—Ahyoung Kim, Junho Park, Juho Lee, Jae Seung Yoon and Seong Hun

1 Kim—Samsung narrowly missed the deadline for a subset of documents due to technical problems
2 or inadvertently late-discovered documents.

3 I declare under penalty of perjury under the laws of the United States of America
4 that the foregoing is true and correct.

5 Executed February 15, 2012, at San Francisco, California.

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/s/Alexander B. Binder

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Alexander B. Binder

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