

EXHIBIT 2
REDACTED PUBLIC
VERSION

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com

3 50 California Street, 22nd Floor
San Francisco, California 94111

4 Telephone: (415) 875-6600

5 Facsimile: (415) 875-6700

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

7 kevinjohnson@quinnemanuel.com

8 Victoria F. Maroulis (Bar No. 202603)

9 victoriamaroulis@quinnemanuel.com

10 555 Twin Dolphin Drive, 5th Floor

11 Redwood Shores, California 94065-2139

12 Telephone: (650) 801-5000

13 Facsimile: (650) 801-5100

14 Michael T. Zeller (Bar No. 196417)

15 michaelzeller@quinnemanuel.com

16 865 S. Figueroa St., 10th Floor

17 Los Angeles, California 90017

18 Telephone: (213) 443-3000

19 Facsimile: (213) 443-3100

20 Attorneys for SAMSUNG ELECTRONICS CO.,
21 LTD., SAMSUNG ELECTRONICS AMERICA,
22 INC. and SAMSUNG
23 TELECOMMUNICATIONS AMERICA, LLC

24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

26 APPLE INC., a California corporation,

27 Plaintiff,

28 vs.

29 SAMSUNG ELECTRONICS CO., LTD., a
30 Korean business entity; SAMSUNG
31 ELECTRONICS AMERICA, INC., a New
32 York corporation; SAMSUNG
33 TELECOMMUNICATIONS AMERICA,
34 LLC, a Delaware limited liability company,

35 Defendant.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF SAMUEL S. LEE IN
SUPPORT OF SAMSUNG'S MOTION
FOR A PROTECTIVE ORDER
PRECLUDING THE DEPOSITIONS OF
TEN HIGH-RANKING SAMSUNG
EXECUTIVES**

Date: March 27, 2012

Time: 10:00 a.m.

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

DECLARATION OF SAMUEL S. LEE

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

I, Samuel S. Lee, declare as follows:

1. I am Senior Legal Counsel for Samsung Electronics Co., Ltd., in the above-entitled action. I make this declaration of personal, first-hand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Based on my role as Senior Legal Counsel, I am familiar with the organizational and reporting structure for Samsung Electronics Co., Ltd. (“SEC”) and its subsidiary, Samsung Telecommunications America, LLC (“STA”).

3. SEC has approximately 190,000 employees. SEC’s various divisions include Semiconductor [REDACTED], Liquid Crystal Display [REDACTED] [REDACTED] Visual Display [REDACTED], Mobile Communications [REDACTED] IT Solutions [REDACTED] Digital Appliances [REDACTED] [REDACTED] and Digital Imaging [REDACTED].

4. [REDACTED]

5. [REDACTED]

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

[Redacted]

[Redacted]

6. [Redacted]

7. [Redacted]

[Redacted]

[Redacted]

[Redacted]

8. [Redacted]

[Redacted]

[Redacted]

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

9. [REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

12. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

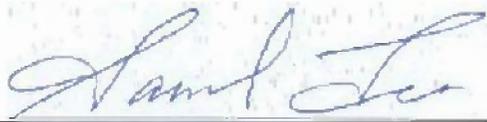
[REDACTED]

[REDACTED]

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

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

Executed February 22, 2012, at Seoul, Korea.



Samuel S. Lee