

EXHIBIT 3
REDACTED PUBLIC
VERSION

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (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 (Bar No. 177129)
kevinjohnson@quinnemanuel.com
6 Victoria F. Maroulis (Bar No. 202603)
victoriamaroulis@quinnemanuel.com
7 555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065-2139
8 Telephone: (650) 801-5000
Facsimile: (650) 801-5100
9

10 Michael T. Zeller (Bar No. 196417)
michaelzeller@quinnemanuel.com
11 865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
12 Telephone: (213) 443-3000
Facsimile: (213) 443-3100
13

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
28

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

DECLARATION OF GEE SUNG CHOI

1 I, Gee Sung Choi, hereby declare as follows:

2 1. I make this declaration in support of the Motion for a Protective Order filed by
3 Defendants Samsung Electronics Co., Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA"),
4 and Samsung Telecommunications America, LLC ("STA") (collectively "Samsung"). I have
5 personal knowledge of the factual information set forth herein.

6 2. I am the Vice Chairman and Chief Executive Officer of SEC. In my role, I either
7 directly or indirectly oversee approximately 190,000 SEC employees world-wide.

8 3. [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]

13 4. [REDACTED]

14 [REDACTED]

15 5. [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

19 6. [REDACTED]

20 [REDACTED]
21 [REDACTED]

22 7. I am not aware of any unique information I have relevant to this litigation that
23 could not be obtained from other Samsung employees.

24
25 I declare under penalty of perjury that the foregoing is true and correct to the best of my
26 knowledge and belief, after a reasonable inquiry.

27
28

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

Executed on the 14 day of February, 2012, at SEOUL, KOREA.

Gee Sung Choi

Gee Sung Choi