

EXHIBIT B

1 HAROLD J. MCELHINNY (CA SBN 66781)
hmcclhinny@mofo.com
2 MICHAEL A. JACOBS (CA SBN 111664)
mjacobs@mofo.com
3 RICHARD S.J. HUNG (CA SBN 197425)
rhung@mofo.com
4 MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
5 Telephone: (415) 268-7000
Facsimile: (415) 268-7522
6

WILLIAM F. LEE (*pro hac vice* anticipated)
william.lee@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)
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

Attorneys for Plaintiff and Counterclaim-
Defendant APPLE INC.

11
12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 APPLE INC., a California corporation,

17 Plaintiff,

18 v.

19 SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
20 ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
21 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

22 Defendants.
23

Case No. 11-cv-01846-LHK

**APPLE'S SUPPLEMENTAL RESPONSE
TO SAMSUNG'S INTERROGATORIES 1,
3 AND/OR 6 TO APPLE RELATING TO
APPLE'S MOTION FOR PRELIMINARY
INJUNCTION**

1 Under Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33, Apple
2 Inc. (“Apple”) supplements its objections and response to Samsung’s Interrogatories Nos. 1, 3
3 and/or 6 Relating to Apple Inc.’s Motion for a Preliminary Injunction, served on July 25, 2011.
4 Apple reserves the right to further supplement or amend these objections and response based on
5 its ongoing investigation of the facts, witnesses, and documents relating to this case.

6 GENERAL OBJECTIONS

7 1. Apple incorporates by reference its general objections in Apple Inc.’s Objections
8 and Responses to Samsung’s Interrogatories to Apple Relating to Apple Inc.’s Motion for a
9 Preliminary Injunction.

10 SUPPLEMENTAL RESPONSES TO INTERROGATORIES NOS 1, 3 AND/OR 6

11 Apple incorporates by reference its specific objections to each of Interrogatories Nos. 1, 3
12 and 6. Subject to and incorporating its General Objections and its specific objections, Apple
13 further responds based on its reasonable investigation in compliance with the requirements of
14 Fed. R. Civ. P. Rule 33.

15 Pursuant to the September 13, 2011 Order Granting-In-Part and Denying-In-Part
16 Defendants’ Motion to Compel (D.N. 205) Apple identifies the “products that it has previously
17 accused of infringing one or more of the four patents at issue in Apple’s preliminary injunction
18 motion” in “a complaint filed in a federal district court or in a correspondence to a third party.”
19 After conducting a reasonable investigation appropriate for the limited preliminary injunction
20 discovery, Apple responds that at least one Apple employee received information identifying or
21 announcing each of these products and each Samsung product accused in Apple’s Amended
22 Complaint (D.N. 75) products by no later than the date indicated below:

23 **HTC Products.**

24 HTC Hero (January 12, 2009)

25 HTC Droid Incredible (April 19, 2010)

26 HTC Droid Incredible 2 (April 25, 2011)

27 HTC Wildfire (July 22, 2010)

28 HTC T-Mobile myTouch 3G (March 4, 2010)

- 1 HTC T-Mobile myTouch 3G Slide (July 13, 2010)
- 2 HTC T-Mobile myTouch 4G (November 16, 2010)
- 3 HTC T-Mobile G1 (September 25, 2008)
- 4 HTC T-Mobile G2 (July 28, 2010)
- 5 HTC Aria (October 8, 2010)
- 6 HTC Desire (March 2, 2010)
- 7 HTC Merge (September 2, 2010)
- 8 HTC Inspire 4G (January 10, 2011)
- 9 HTC Evo Shift 4G (January 10, 2011)
- 10 HTC Thunderbolt 4G (January 9, 2011)
- 11 HTC Flyer (February 15, 2011)
- 12 HTC Jetstream (August 31, 2011)
- 13 HTC Evo View 4G (June 30, 2011)

14

15 **Nokia Products.**

- 16 Nokia N900 (August 27, 2009)
- 17 Nokia N8 (August 27, 2010)
- 18 Nokia C6 (April 22, 2010)
- 19 Nokia C7 (September 14, 2010)
- 20 Nokia E7 (September 14, 2010)

21

22 **Samsung Products**

- 23 Samsung Galaxy S 4G (April 9, 2011)
- 24 Droid Charge (May 14, 2011)
- 25 Infuse 4G (May 15, 2011)
- 26 Galaxy Tab 10.1 (February 13, 2011)
- 27 Samsung Acclaim (October 14, 2010)
- 28 Samsung Captivate (June 21, 2010)

- 1 Samsung Continuum (November 22, 2010)
- 2 Exhibit 4G (June 16, 2011)
- 3 Epic 4G (August 25, 2010)
- 4 Fascinate (September 21, 2010)
- 5 Gem (April 15, 2011)
- 6 Galaxy Ace (February 9, 2011)
- 7 Galaxy Prevail (May 4, 2011)
- 8 Galaxy S (i9000) (March 24, 2010)
- 9 Gravity (March 22, 2010)
- 10 Indulge (February 9, 2011)
- 11 Infuse 4G (January 14, 2011)
- 12 Intercept (September 23, 2010)
- 13 Mesmerize (April 15, 2011)
- 14 Nexus S (November 29, 2010)
- 15 Nexus S 4G (March 22, 2011)
- 16 Replenish (April 2011)
- 17 Showcase i500 (January 17, 2011)
- 18 Showcase Galaxy S (June 16, 2011)
- 19 Sidekick (June 16, 2011)
- 20 Transform (October 8, 2010)
- 21 Vibrant (September 7, 2010)
- 22 Galaxy S II (aka Galaxy S 2) (February 14, 2011)
- 23 Galaxy Tab (June 15, 2010)
- 24
- 25
- 26
- 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

Dated: September 30, 2011

MORRISON & FOERSTER LLP

By: /s/ Richard S.J. Hung
RICHARD S.J. HUNG

Attorneys for Plaintiff
APPLE INC.