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11 Attorneys for Plaintiff and  
 12 Counterclaim-Defendant APPLE INC.

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

17 APPLE INC., a California corporation,  
 18  
 Plaintiff,  
 19  
 v.  
 20 SAMSUNG ELECTRONICS CO., LTD., a  
 21 Korean corporation; SAMSUNG  
 ELECTRONICS AMERICA, INC., a New  
 22 York corporation; and SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 23 LLC, a Delaware limited liability company,  
 24  
 Defendants.

Case No. 11-cv-01846-LHK

**REPLY DECLARATION OF  
 MINN CHUNG IN SUPPORT IN  
 SUPPORT OF APPLE’S MOTION FOR  
 RULE 37(B)(2) SANCTIONS FOR  
 SAMSUNG’S VIOLATION OF TWO  
 DISCOVERY ORDERS**

Date: March 27, 2012  
 Time: 10:00 a.m.  
 Place: Courtroom 5, 4th Floor  
 Judge: Hon. Paul S. Grewal

25  
 26 **REDACTED PUBLIC VERSION**  
 27  
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1 I, MINN CHUNG, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP, counsel of record in  
3 this action for plaintiff Apple Inc. (“Apple”). I submit this reply declaration in support of Apple  
4 Inc.’s Reply In Support Of Motion For Rule 37(B)(2) Sanctions For Samsung’s Violation Of Two  
5 Discovery Orders (the “Reply”). I had also submitted a declaration in support of Apple Inc.’s  
6 Motion For Rule 37(B)(2) Sanctions For Samsung’s Violation Of Two Discovery Orders (the  
7 “Motion”) filed on February 8, 2012. Unless otherwise indicated, I have personal knowledge of  
8 the matters set forth below. If called as a witness I could and would testify competently as  
9 follows:

10 2. I am a native Korean speaker and proficient in written Korean language. I have a  
11 Bachelor of Science degree in physics from the Massachusetts Institute of Technology and spent  
12 over 15 years developing technology products, both hardware and software, before attending law  
13 school.

14 3. Since Apple filed its Motion on February 8, 2012, Samsung has produced  
15 documents from its Designer Custodians that reference Apple products, including the documents  
16 described below, which were required to be produced by October 7, 2011 under the Court’s Order  
17 of September 28, 2011, and then, after Samsung failed to comply, were required to be produced  
18 by December 31, 2011 under the Court’s Order of December 22, 2011.

19 4. [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

26 5. [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

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[REDACTED]

[REDACTED]

9. In addition, since February 8, 2012, Samsung has produced documents showing Samsung's analysis of and consideration of Apple's products from sources other than the Designer Custodians, including the documents described below, which were required to be produced by January 15, 2012 under the Court's Order of December 22, 2011.

10. [REDACTED]

[REDACTED]

[REDACTED]

11. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12. [REDACTED]

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14. On February 22, a number of highly relevant documents that show analysis and comparison of Apple products by Samsung were produced [REDACTED]

[REDACTED]

15. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

17. [REDACTED]

[REDACTED]

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19. [REDACTED]

20. [REDACTED]

21. [REDACTED]

22. On February 24, Samsung produced a highly relevant document [REDACTED]  
[REDACTED] that should have been produced by January 15, 2012 under the December 22 Order.  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



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**ATTESTATION OF E-FILED SIGNATURE**

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Minn Chung has concurred in this filing.

Dated: March 5, 2012

/s/ Michael A. Jacobs  
Michael A. Jacobs