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

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

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

Case No. 11-cv-01846-LHK (PSG)

**SUPPLEMENTAL  
 DECLARATION OF MIA MAZZA  
 IN SUPPORT OF APPLE'S  
 MOTION TO COMPEL TIMELY  
 PRODUCTION OF FOREIGN-  
 LANGUAGE AND OTHER  
 DOCUMENTS IN ADVANCE OF  
 RELATED DEPOSITIONS**

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

1 I, Mia Mazza, declare as follows:

2 1. I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.  
3 (“Apple”). I am licensed to practice law in the State of California. Unless otherwise indicated, I  
4 have personal knowledge of the matters stated herein or understand them to be true from  
5 members of my litigation team. I make this Supplemental Declaration in support of Apple’s  
6 Reply in Support of its Motion to Compel Timely Production of Foreign Language and Other  
7 Documents in Advance of Related Depositions (“Motion to Compel”).

8 2. Attached hereto as Exhibit A-1 is a table prepared by my litigation team that lists  
9 each Samsung witness deposed by Apple in Apple’s offensive case to date, the date and time of  
10 the witness’s deposition, the date and time of any productions of documents sourced to that  
11 witness, and the volume of each production in terms of both documents and pages. Exhibit A-1 is  
12 an updated version of Exhibit A to my Declaration in Support of Apple’s February 23, 2012,  
13 Reply in Support of the Motion to Compel.

14 3. As set forth in Exhibit A-1, Dong-Sub Kim was deposed on February 27, 2012 at  
15 4 p.m. Pacific Time. Samsung produced 0 documents sourced to this witness five or more days  
16 before the deposition. Samsung then produced 419 Korean-language documents, totaling 4,858  
17 pages, less than four days before the deposition.

18 4. As set forth in Exhibit A-1, Seung Hun Yoo was deposed on February 27, 2012 at  
19 4 p.m. Pacific Time. Samsung produced 1 Korean-language document, totaling 27 pages, 44 days  
20 before the deposition. Samsung then produced 6,184 Korean-language documents, totaling  
21 30,277 pages, less than four days before the deposition. ***Samsung then produced another 668***  
22 ***documents, totaling 5,680 pages, five hours after the deposition started.***

23 5. As set forth in Exhibit A-1, Deong Seok Ryu was deposed on February 29, 2012 at  
24 9 a.m. Pacific Time. Samsung produced 0 documents sourced to this custodian five or more days  
25 before the deposition. Samsung then produced 3,209 Korean-language documents, totaling  
26 23,263 pages, less than four days before the deposition.

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1           6.       As set forth in Exhibit A-1, Corey Kerstetter was deposed on February 29, 2012 at  
2 11 a.m. Pacific Time. Samsung produced 0 documents sourced to this custodian three or more  
3 days before the deposition. Samsung then produced 3,055 documents, totaling 91,722 pages, less  
4 than two days before the deposition.

5           7.       As set forth in Exhibit A-1, Min Cheol Shin was deposed on March 1, 2012 at  
6 4 p.m. Pacific Time. Samsung produced 0 documents sourced to this custodian three or more  
7 days before the deposition. Counsel for Apple sent two emails to counsel for Samsung on March  
8 28 and 29, 2012, asking whether Samsung was going to produce any documents for this witness  
9 and, if so, when and what volume. Samsung did not respond to either email. Samsung then  
10 produced 1,421 documents, totaling 37,156 pages, *5 hours* before the deposition.

11           8.       As set forth in Exhibit A-1, Dong Hoon Chang is scheduled to be deposed on  
12 March 6, 2012 at 4 p.m. Pacific Time. Samsung produced 0 documents sourced to this custodian  
13 five or more days before the deposition. Samsung then produced 314 Korean-language  
14 documents, totaling 12,758 pages, less than four days before the deposition.

15           9.       In total, since the filing of Apple's reply brief in support of the Motion to Compel  
16 ten days ago, Samsung has produced an additional 12,305 Korean-language documents totaling  
17 115,791 pages less than five days before depositions, and 3,097 English-language documents  
18 totaling 92,338 pages less than 5 days before depositions. Of these tardy Korean- and English-  
19 language document productions combined, 5,144 documents totaling 134,558 pages were  
20 produced *less than 3 days* before depositions.

21           10.      As set forth in Exhibit A-1, Hye Jung Lee is scheduled to be deposed on March 5,  
22 2012, at 4 p.m. Pacific Time; Seung Yun Lee is scheduled to be deposed on March 6, 2012 at  
23 4 p.m. Pacific Time, Sung Hee Hwang is scheduled to be deposed on March 6, 2012 at 4 p.m.  
24 Pacific Time, and Oh Chae Kwon is scheduled to be deposed on March 7, 2012 at 4 p.m. Pacific  
25 Time. As of at least 9 p.m. Pacific Time on the date of this Declaration, Samsung had produced 0

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1 documents sourced to any of these witnesses. Samsung produced some documents at 9:03 p.m.  
2 Pacific Time tonight , but Apple will not know the custodian of those documents for several hours.

3 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
4 March 4, 2012, at San Francisco, California.

5 /s/ Mia Mazza

6 Mia Mazza

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**ATTESTATION OF E-FILED SIGNATURE**

I, Richard S.J. Hung, 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 Mia Mazza has concurred in this filing.

Dated: March 4, 2012

/s/ Richard S.J. Hung  
Richard S.J. Hung