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 14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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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.
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CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF MELISSA A.
 DALZIEL IN SUPPORT OF SAMSUNG'S
 SUPPLEMENTAL RESPONSE IN
 SUPPORT OF ITS OPPOSITION TO
 APPLE'S MOTION TO COMPEL
 DOCUMENTS**

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

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I, Melissa A. Dalziel, declare as follows:

1. I am Of Counsel with Quinn Emanuel Urquhart & Sullivan LLP, attorneys for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively, "Samsung"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Since Samsung filed its Opposition to Apple's Motion to Compel Timely Production of Foreign-Language and Other Documents in Advance of Related Depositions on February 15, 2012, Apple has frequently produced documents less than five days in advance of each deposition, as reflected in the chart below:

Apple Deponent	Deposition Date	Date Samsung Received Apple's Late Productions	No. of Pages Produced	Number of Days Before/After Deposition that Apple Last Produced Custodial Documents
John Ternus	February 10	February 6	814	4 days before
		February 20	201	10 days after
Richard Dinh	February 16	February 15	17,020	1 day before
Michael Tchao	February 21	February 20	195	1 day before
Mark Buckley	February 23	February 22	3	1 day before depo
Wei Chen	March 1	February 26	975	4 days before depo
		February 29	915	2 days before
Achim Pantfoerder	March 1	February 29	78	1 day before
Myra Haggerty	March 2	February 28	1,374	3 days before
		February 29	35	2 days before
		March 1	268	1 day before
Art Rangel	March 2	February 29	6,619	2 days before
		March 1	26	1 day before
Tan Tang	March 2	February 29	25	2 days before
		March 1	170	1 day before

3. Apple has yet to produce any documents for the Chris Harris deposition tomorrow or the deposition of B.J. Watrous, which is scheduled to take place on Thursday, March 8th.

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

Executed March 5, 2012, at Los Angeles, California.

/s/ Melissa A. Dalziel
Melissa A. Dalziel