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13 Attorneys for SAMSUNG ELECTRONICS
 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF DIANE C.
 HUTNYAN IN SUPPORT OF
 SAMSUNG'S ADMINISTRATIVE
 MOTION FOR TEMPORARY
 RELIEF FROM THE LEAD
 COUNSEL MEET AND CONFER
 REQUIREMENT OR ALTERNATIVELY
 FOR AN EXTENSION OF THE
 DEADLINE TO FILE MOTIONS TO
 COMPEL**

1 I, Diane C. Hutnyan, declare:

2 1. I am a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
4 Telecommunications America, LLC (collectively, "Samsung"). I am licensed to practice law in
5 the State of California. I submit this declaration in support of Samsung's Administrative Motion
6 For Temporary Relief From the Lead Counsel Meet and Confer Requirement or Alternatively For
7 An Extension of the Deadline To File Motions To Compel. I have personal knowledge of the
8 facts set forth in this declaration and, if called upon as a witness, I could and would testify to the
9 following facts.
10

11 2. Attached hereto as Exhibit 1 is a true and correct copy of a March 1, 2012 letter
12 from Samsung's counsel to Apple's counsel.

13 3. Attached hereto as Exhibit 2 is a true and correct copy of a March 10, 2012 letter
14 from Samsung's counsel to Apple's counsel.

15 4. Apple produced more than 470,000 pages of new documents on or after the last day
16 of discovery, producing 210,000 of them after the discovery cut-off. Thousands of these new
17 documents were from the files of witnesses who were deposed earlier in the case, including many
18 of the inventors of the patents-in-suit.
19

20 5. Many categories of documents that Apple has not yet produced were identified for
21 the first time in depositions taken in the last few weeks.
22

23 6. Attached hereto as Exhibit 3 is a true and correct copy of the March 6, 2012 letter
24 from Apple's counsel to Samsung's counsel.

25 7. Attached hereto as Exhibit 4 is a true and correct copy of the March 9, 2012 letter
26 from Samsung's counsel to Apple's counsel.
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1 8. Attached hereto as Exhibit 5 is a true and correct copy of the March 10, 2012 letter
2 from Apple's counsel to Samsung's counsel.

3 9. Discovery responses served by Apple on March 8-10 included: Apple Inc.'s
4 Second Amended Objections and Response to Samsung Electronics Co. Ltd.'s Interrogatory No. 5
5 to Apple Inc.; Apple Inc.'s Fifth Amended Objections and Response to Samsung's Interrogatory
6 No. 1 to Apple; Apple Inc.'s Supplemental Objections and Responses Samsung's Third Set of
7 Interrogatories; Apple Inc.'s Second Supplemental Objection and Response to Samsung
8 Electronics Co. Lit.'s Interrogatory No. 14 to Apple Inc.; Apple Inc.'s Amended Objections and
9 Responses to Samsung Electronics Co. Ltd.'s Interrogatory Nos. 4, 6, 7, 16, 17, 18 to Apple Inc.;
10 Apple's Supplemental Responses to Samsung's Preliminary Injunction Interrogatories 2 and 4 and
11 Third Supplemental Responses to Preliminary Injunction Interrogatories 1, 3, 6, and 7; Apple
12 Inc.'s Corrected Amended Objections and Responses to Samsung Electronics Co. Ltd.'s
13 Interrogatory Nos. 4, 6, 7, 16, 17, 18 to Apple Inc.; Apple Inc.'s Objections and Responses to
14 Samsung's Fourth Set of Interrogatories; Apple Inc.'s Objections and Responses to Samsung's
15 Sixth and Seventh Sets of Requests for Production; and Apple Inc.'s Responses to Samsung's
16 Fourth and Fifth Sets of Requests for Admission

17 10. Attached hereto as Exhibit 6 is a true and correct copy of a March 12, 2012 letter
18 from Samsung's counsel to Apple's counsel.

19 11. Attached hereto as Exhibit 7 is a true and correct copy of a March 12, 2012 email
20 from Apple's counsel to Samsung's counsel.

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

23 Executed in Los Angeles, California on March 12, 2012.

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/s/ Diane C. Hutnyan

Diane C. Hutnyan

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GENERAL ORDER ATTESTATION

I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Diane Hutnyan.

/s/ Victoria Maroulis