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

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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 Defendants.

ASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF CHRISTOPHER E.  
PRICE IN SUPPORT OF SAMSUNG'S  
OPPOSITION TO APPLE'S MOTION  
FOR RULE 37(b)(2) SANCTIONS FOR  
SAMSUNG'S ALLEGED VIOLATION OF  
JANUARY 27, 2012 DAMAGES  
DISCOVERY ORDER**

Date: April 3, 2012

Time: 10:00 a.m.

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

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**DECLARATION OF CHRISTOPHER E. PRICE**

I, Christopher E. Price, declare as follows:

1. I am Of Counsel with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively, “Samsung”). I submit this declaration in support of Samsung’s Opposition to Apple’s Rule 37(b)(2) Motion for Samsung’s Alleged Violation of the January 27, 2012 Damages Discovery Order. I have personal knowledge of the facts set forth in this declaration, except as otherwise noted, and, if called upon as a witness, I could and would testify to such facts under oath.

2. Attached hereto as Exhibit 1 is a true and accurate copy of documents produced by Apple in this action, Bates numbered APLNDC-Y0000148289-8458.

3. Attached hereto as Exhibit 2 is a true and accurate copy of a March 8, 2012 email from Ken MacCardle, producing documents Bates numbered APLNDC-Y0000148298 - APLNDC-Y0000231186.

4. Attached hereto as Exhibit 3 is a true and accurate copy of Exhibit 18 to the February 23, 2012 Deposition Transcript of Mark Buckley, Apple’s Rule 30(b)(6) witness in this action on certain financial topics.

5. Attached as Exhibit 4 is a true and accurate copy of documents produced by Apple in this action, Bates numbered APLNDC-Y0000232396-2430.

6. Attached as Exhibit 5 is a true and accurate copy of a March 8, 2012 email from Mollie B. Gabrys, producing documents Bates numbered APLNDC-Y0000232396 - APLNDC-Y0000232430.

7. Attached as Exhibit 6 is a true and accurate copy of a February 10, 2012 letter from Jason Bartlett, counsel for Apple, to Diane Hutnyan, counsel for Samsung.

8. Attached as Exhibit 7 is a true and accurate copy of a document produced by Apple in this action Bates numbered APLNDC-WH-A0000024846-4851.

1           9.       Attached hereto as Exhibit 8 is a true and accurate copy of March 7, 2012 letter  
2 from Matthew Hoff, counsel for Apple, to Rachel Kassabian, counsel for Samsung, producing  
3 documents Bates numbered, APLNDC-WH-A0000024846 - APLNDC-WH-A0000024851.  
4           10.       Attached hereto as Exhibit 9 is a true and accurate copy of February 23, 2012  
5 letter from Jason Bartlett to Diane C. Hutnyan.  
6           11.       Attached hereto as Exhibit 10 is a true and accurate copy of documents produced  
7 by Apple, Bates numbered APLNDC-Y0000232431 - APLNDC-Y0000232446.  
8           12.       Attached as Exhibit 11 is a true and accurate copy of a March 8, 2012 email from  
9 Mollie B. Gabrys, producing documents Bates numbered APLNDC-Y0000232431 - APLNDC-  
10 Y0000232446.  
11          13.       Attached as Exhibit 12 is true and accurate copy of the relevant excerpts of Dkt.  
12 No. 613, Apple Inc.'s Motion to Compel Production of Documents and Things (Under Seal).  
13 The motion is 136 pages long.  
14          14.       Attached as Exhibit 13 is a true and correct copy of Dkt. No. 615, the Declaration  
15 of Erik J. Olson in Support of Motion to Compel Production of Documents and Things, dated  
16 January 11, 2012.  
17           I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct.  
19           Executed on March 12, 2012, at Los Angeles, California.  
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Christopher E. Price