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 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 REPLY IN SUPPORT OF  
 ITS 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. Of the documents Samsung has produced in this case, approximately 57 percent  
12 were produced by the end of January and approximately 89 percent were produced by the end of  
13 February. Of the documents Apple has produced in this case, approximately 35 percent were  
14 produced by the end of January and approximately 38 percent were produced between March 1  
15 and March 8, 2012. These numbers are based on the state of Apple's production as of the  
16 discovery cut-off in this case. Apple produced a further 210,000 pages of documents on March 9  
17 and its productions appear to be ongoing, with hundreds of additional pages produced only  
18 yesterday.  
19

20 3. On the final day to serve discovery, February 7, 2012, Apple served its 8<sup>th</sup> through  
21 13<sup>th</sup> sets of Requests for Admission, its 15<sup>th</sup> and 16<sup>th</sup> sets of interrogatories, its 16<sup>th</sup> set of Requests  
22 for Production, and its 9<sup>th</sup> Rule 30(b)(6) Notice. All together, Apple served well over 1,000  
23 discovery requests exactly thirty days before the discovery cut-off. Apple served additional  
24 deposition notices, including its 10<sup>th</sup> Rule 30(b)(6) Notice, after February 7.  
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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