

EXHIBIT 2

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*Attorneys for Plaintiff and
Counterclaim-Defendant Apple Inc.*

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

16 APPLE INC., a California corporation,

17 Plaintiff,

18 vs.

19 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity, SAMSUNG
20 ELECTRONICS AMERICA, INC., a New
York corporation, and SAMSUNG
21 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

22 Defendants.
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Civil Action No. 11-CV-01846-LHK

JURY TRIAL DEMANDED

1 SAMSUNG ELECTRONICS CO., LTD., a
2 Korean business entity, SAMSUNG
3 ELECTRONICS AMERICA, INC., a New
4 York corporation, and SAMSUNG
5 TELECOMMUNICATIONS AMERICA,
6 LLC, a Delaware limited liability company, a
7 California corporation,

8 Counterclaim-Plaintiffs,

9 v.

10 APPLE INC., a California corporation,

11 Counterclaim-Defendant.

12 **PLAINTIFF AND COUNTERCLAIM-DEFENDANT APPLE INC.'S FOURTH SET OF**
13 **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS (NOS. 156-187)**

14 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff and
15 Counterclaim-Defendant Apple Inc. ("Apple") hereby requests that Defendants Samsung
16 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
17 America, LLC (collectively, "Samsung") produce documents and things responsive to the
18 following requests (the "Requests") at the office of Wilmer Cutler Pickering Hale and Dorr LLP,
19 950 Page Mill Road, Palo Alto, California, 94304 within thirty (30) days of service of these
20 requests.

21 **DEFINITIONS**

22 The words and phrases used in these Requests shall have the meanings ascribed to them
23 under the Federal Rules of Civil Procedure and the Local Rules of the United States District
24 Court for the Northern District of California. In addition, the following terms shall have the
25 meanings set forth below whenever used in any Request:
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1 1. “Samsung,” “You,” “Your,” and/or Defendants mean Samsung Electronics Co.,
2 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC and
3 all predecessors, successors, predecessors-in-interest, successors-in-interest, subsidiaries,
4 divisions, parents, and/or affiliates, past or present, any companies that have a controlling
5 interest in Defendants, and any current or former employee, officer, director, principal, agent,
6 consultant, representative, or attorney thereof, or anyone acting on their behalf.
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8 2. “Apple” means Apple Inc. and its subsidiary entities, divisions, predecessors,
9 successors, present and former officers, directors, employees, representatives, agents, and anyone
10 acting on its behalf.
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12 3. “Qualcomm” means Qualcomm Inc. and its subsidiary entities, divisions,
13 predecessors, successors, present and former officers, directors, employees, representatives,
14 agents, and anyone acting on its behalf.
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16 4. “Intel” means Intel Corp. and its subsidiary entities, divisions, predecessors,
17 successors, present and former officers, directors, employees, representatives, agents, and anyone
18 acting on its behalf.
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20 5. “Samsung Patents-In-Suit” shall mean United States Patent Nos. 6,928,604,
21 7,050,410, 7,069,055, 7,079,871, 7,200,792, 7,362,867, 7,386,001, 7,447,516, 7,456,893,
22 7,577,460, 7,675,941, and 7,698,711, individually and collectively, and all foreign counterparts
23 thereof.
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25 6. “The ’604 Patent” shall mean U.S. Patent No. 6,928,604, issued on August 9,
26 2005 and entitled “Turbo Encoding/Decoding Device and Method for Processing Frame Data
27 According to QOS.”
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1 7. “The ’410 Patent” shall mean U.S. Patent No. 7,050,410, issued on May 23, 2006
2 and entitled “Apparatus and Method for Controlling a Demultiplexer and a Multiplexer Used for
3 Rate Matching in a Mobile Communication System.”

4 8. “The ’055 Patent” shall mean U.S. Patent No. 7,069,055, issued June 27, 2006
5 and entitled “Mobile Telephone Capable of Displaying World Time and Method for Controlling
6 the Same.”

7 9. “The ’871 Patent” shall mean U.S. Patent No. 7,079,871, issued on July 18, 2006
8 and entitled “Portable Telephone and Method of Displaying Data Thereof.”

9 10. “The ’792 Patent” shall mean U.S. Patent No. 7,200,792, issued on April 3, 2007
10 and entitled “Interleaving Apparatus and Method for Symbol Mapping in an HSDPA Mobile
11 Communication System.”

12 11. “The ’867 Patent” shall mean U.S. Patent No. 7,362,867, issued on April 22, 2008
13 and entitled “Apparatus and Method for Generating Scrambling Code in UMTS Mobile
14 Communication System.”

15 12. “The ’001 Patent” shall mean U.S. Patent No. 7,386,001, issued on June 10, 2008
16 and entitled “Apparatus and Method for Channel Coding and Multiplexing in CDMA
17 Communication System.”

18 13. “The ’516 Patent” shall mean U.S. Patent No. 7,447,516, issued on November 4,
19 2008 and entitled “Method and Apparatus for Data Transmission in a Mobile
20 Telecommunication System Supporting Enhanced Uplink Service.”

21 14. “The ’893 Patent” shall mean U.S. Patent No. 7,456,893, issued on November 25,
22 2008 and entitled “Method of Controlling Digital Image Processing Apparatus for Efficient
23 Reproduction and Digital Image Processing Apparatus Using the Method.”

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1 15. “The ’460 Patent” shall mean U.S. Patent No. 7,577,460, issued on August 18,
2 2009 and entitled “Portable Composite Communication Terminal for Transmitting/Receiving
3 and Images, and Operation Method and Communication System Thereof.”

4 16. “The ’941 Patent” shall mean U.S. Patent No. 7,675,941, issued on April 13, 2010
5 and entitled “Method and Apparatus for Transmitting/Receiving Packet Data Using Pre-Defined
6 Length Indicator in a Mobile Communication System.”

7 17. “The ’711 Patent” shall mean U.S. Patent No. 7,698,711, issued on March 9, 2010
8 and entitled “Multi-Tasking Apparatus and Method in Portable Terminal.”

9 18. “Samsung Named Inventors” shall mean the persons named as inventors on any
10 of the Samsung Patents-in-Suit: Youn-Hyoung Heo; Ju-Ho Lee; Joon-Young Cho; Young-Bum
11 Kim; Yong-Jun Kwak; Soeng-Hun Kim; Gert-Jan Van Lieshout; Himke Van Der Velde; Jae-
12 Kim; Yong-Jun Kwak; Soeng-Hun Kim; Gert-Jan Van Lieshout; Himke Van Der Velde; Jae-
13 Yoel Kim; Hee-Won Kang; Hun-Kee Kim; Gin-Kyn Choi; Jae-Seung Yoon; Noh-Sun Kim; Jun-
14 Sung Lee; Yong-Suk Moon; Hye-Young Lee; Se-Hyoung Kim; Min-Goo Kim; Beong-Jo Kim;
15 Soon-Jae Choi; Chang-Soo Park; Joong-Ho Jeong; Hyeon-Woo Lee; Beong-Jo Kim; Se-Hyong
16 Kim; Min-Goo Kim; Soon-Jae Choi; Young-Hwan Lee; Pyung-soo Kim; Hyuk-soo Son; Sung-
17 ho Eun; Jae-Min Kim; Jeong-Seok Oh; Sang-Ryul Park; and Moon-Sang Jeong.

18 19. “Product” means a machine, manufacture, apparatus, device, instrument,
19 mechanism, appliance, or an assemblage of components/parts (either individually or collectively)
20 that are designed to function together electronically, mechanically, chemically, or otherwise,
21 including any offered for sale or under development.

22 20. “Software” shall mean and include all forms of code including, but not limited to,
23 source code, object code, firmware, compiled code, byte code, interpreted code, any form of
24 code stored in any storage medium (for example, ROM or Flash RAM chips) on any product, or
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1 code transmitted to products. Software further includes files written in any programming
2 language, including, but not limited to, “C”, “C++”, assembler, VHDL, Verilog, digital signal
3 processor (“DSP”) programming language, “make” files, “include” files, script files, link files,
4 and other human-readable text files used in the generation and/or building of software directly
5 executed on a microprocessor, microcontroller, and/or DSP.

7 21. “Mobile Wireless Telecommunications Device(s)” shall mean any device capable
8 of transmitting and receiving cellular telephonic communications.

9 22. “Accused Apple Product” shall mean any Product made or marketed by or on
10 behalf of Apple that, when made, used, offered for sale, sold, imported, or otherwise practiced in
11 the United States (either by itself or in combination with other devices, methods) by or on behalf
12 of Apple or any user, allegedly constitutes, practices, incorporates, or embodies a device, or
13 method claimed in one or more of the Samsung Patents-in-Suit. This definition includes without
14 limitation any Apple Product that is accused of directly or indirectly infringing one or more of
15 the Samsung Patents-in-Suit, including the iPhone, iPhone 3G, iPhone 3GS and iPhone 4.

17 23. “Samsung Covered Product” shall mean any Product sold or offered for sale at
18 any time by Samsung that Samsung contends practices any of the Samsung Patents-In-Suit.

20 24. “3GPP” shall mean Third Generation Partnership Project.

21 25. “ARIB” shall mean Association of Radio Industries and Businesses.

22 26. “ETSI” shall mean the European Telecommunications Standards Institute.

23 27. “Standards Setting Organization” or “SSO” shall mean an organization that
24 adopts standards governing an industry or technological field, and includes without limitation
25 3GPP, ARIB, and ETSI.

26 28. “IPR” shall mean intellectual property rights, and includes patent rights.

1 29. “Defined Wireless Standards” includes all standards to which Samsung claims or
2 has claimed that its patents are essential, including but not limited to the UMTS standard and any
3 standard that is backwards compatible thereto, including but not limited to Global System for
4 Mobile communications (“GSM”), Enhanced Data Rates for GSM Evolution (“EDGE”), and
5 GSM Packet Radio Services (“GPRS”).
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7 30. “Essential” shall mean necessary for implementation of any mobile wireless
8 standard, such that the standard, or some part of the standard, could not be practiced without
9 infringing the patent or technology to which “essential” refers.

10 31. “Samsung’s Alleged Essential Technology” shall mean Samsung technology,
11 IPR, patents, patent applications, or patent rights that Samsung has: (1) identified or declared to
12 an SSO as actually or potentially essential to implement a Defined Wireless Standard; (2)
13 identified or asserted to any actual or prospective licensee as actually or potentially essential to
14 implement a Defined Wireless Standard; or (3) otherwise identified, in internal or external
15 discussions, as actually or potentially essential to implement a Defined Wireless Standard.
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17 32. “FRAND” in relation to licensing or license terms means “fair, reasonable, and
18 non-discriminatory terms and conditions” as those terms are used in the ETSI Intellectual Rights
19 Policy contained in Annex 6 of the ETSI Rules of Procedure.
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21 33. “Litigation” means the above-referenced action, 11-cv-01846 (LHK) in the
22 United States District Court for the Northern District of California.

23 34. “Answer” shall mean Samsung’s Answer and Counterclaims to Apple’s Amended
24 Complaint, filed June 30, 2011, in the above-referenced action.
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1 35. “Counterclaims” shall mean the Counterclaims set forth in Apple’s Answer,
2 Defenses and Counterclaims in Reply to Samsung’s Counterclaims, filed July 21, 2011, in the
3 above-referenced action.

4 36. “Person(s)” means natural persons as well as business entities and associations of
5 all sorts, including partnerships, companies, proprietorships, joint ventures, corporations,
6 government agencies, and unincorporated associations.

7 37. “Document(s)” has the broadest possible meaning permitted by Federal Rules of
8 Civil Procedure Rules 26 and 34 and the relevant case law, and the broadest meaning consistent
9 with the terms “writings” or “recordings” as set forth in Rule 1001 of the Federal Rules of
10 Evidence, and specifically and without limitation include tangible things and electronically
11 stored information, including e-mail and information stored on computer disk or other electronic,
12 magnetic, or optical data storage medium. “Document(s)” also includes all drafts or non-final
13 versions, alterations, modifications, and amendments to any of the foregoing.

14 38. “Communication(s)” means the transmittal of information in the form of facts,
15 ideas, inquiries, and any exchange or transfer of information whether written, oral, electronic, or
16 in any form.

17 39. “Tangible Thing(s)” has the broadest possible meaning permitted by Federal
18 Rules of Civil Procedure 26 and 34 and the relevant case law.

19 40. “Entity” or “Entities” means, including without limitation, corporation, company,
20 firm, partnership, joint venture, association, governmental body or agency, or persons other than
21 a natural person.

22 41. “Third Party” or “Third Parties” means all persons who are not parties to this
23 Litigation, as well as their officers, directors, employees, agents and attorneys.
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1 42. “Relating” means regarding, referring to, concerning, mentioning, reflecting,
2 pertaining to, analyzing, evidencing, stating, involving, identifying, describing, discussing,
3 documenting, commenting on, dealing with, embodying, responding to, supporting,
4 contradicting, comprising, containing, or constituting (in whole or in part), as the context makes
5 appropriate.
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7 43. “Transport channel processing technology” means information describing or
8 relating to handling, conveying, formatting, combining, manipulating and/or transmitting one or
9 more data paths, where each data path may have unique characteristics with respect to the other
10 data paths, including, for example, Transmission Time Interval (TTI) and content (e.g., voice,
11 video, high speed data, etc.).
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13 44. “Data packet construction” means assembly of a protocol data unit (PDU)
14 including a header and a data field, wherein the data field includes padding and/or a complete,
15 segmented, and/or concatenated service data unit (SDU) from another layer of a communication
16 system.
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18 45. “Uplink transmission power control” means controlling uplink transmission
19 power for transmitting data to prevent the total transmit power from exceeding the maximum
20 allowed power.
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22 46. The use of a verb in any tense shall be construed as the use of the verb in all other
23 tenses.
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25 47. The use of the singular form of any word includes the plural and vice versa.
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27 48. The singular is to be construed as including the plural and vice versa. “And” as
28 well as “or” are to be construed either disjunctively or conjunctively to acquire the broadest
29 meaning possible, so as to bring within the scope of the Request all information that might

1 otherwise be construed to be outside its scope. The term “all” is to be construed to mean “any”
2 and “each” and vice versa.

3 49. “Including” shall be construed to mean “including, without limitation” or
4 “including, but not limited to.”
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6 **INSTRUCTIONS**

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8 1. Each document is to be produced along with all non-identical drafts thereof in
9 their entirety, without abbreviation or redaction, and as maintained in the ordinary course of
10 business.

11 2. If Samsung withholds any documents on a claim of privilege, provide a statement
12 of the claim of privilege and all facts relied upon in support of that claim as required by Rule
13 26(b)(5) of the Federal Rules of Civil Procedure.
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15 3. Documents responsive to each Request must be produced in full and subject to
16 any Request being narrowed by the parties’ meeting and conferring regarding your
17 corresponding requests to Plaintiff, if applicable.
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19 **REQUESTS FOR PRODUCTION**

20 21 **REQUEST NO. 156**

22 All documents and communications with an expert witness who is expected to testify in
23 this Litigation that (i) relate to compensation for the expert’s work or testimony; (ii) identify
24 facts or data that Samsung’s attorneys provided and that the expert considered in forming any
25 opinions to be expressed; and (iii) identify assumptions that Samsung’s attorneys provided and
26 the expert relied on in forming any opinions to be expressed.
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1 **REQUEST NO. 157**

2 All documents and things relating to the alleged nexus between any alleged commercial
3 success of products embodying any alleged invention claimed by the Samsung Patents-In-Suit
4 and the alleged advantages of the invention, including without limitation any customer surveys
5 reflecting the bases for purchasing decisions.
6

7 **REQUEST NO. 158**

8 All documents relating to the *Georgia Pacific* factors as those factors relate to Samsung's
9 claim for damages arising from Apple's alleged infringement of the Samsung Patents-In-Suit.
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11 **REQUEST NO. 159**

12 All documents and things relating to accolades and awards given to products that embody
13 any alleged invention claimed by the Samsung Patents-In-Suit.
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15 **REQUEST NO. 160**

16 All documents and things evidencing Samsung's licensing program, including without
17 limitation documents sufficient to identify all licensing personnel, location of said personnel, and
18 duties of said personnel.
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20 **REQUEST NO. 161**

21 All documents and things relating to Samsung's attempts to license to others the
22 Samsung Patents-In-Suit and any related patents which have not yet resulted in a license
23 agreement, including without limitation cease and desist letters, draft agreements, and other
24 communications.
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26 **REQUEST NO. 162**

27 Documents sufficient to identify any attempt by Samsung to enforce, either in the United
28 States or abroad, the Samsung Patents-In-Suit and any related patents.

1 **REQUEST NO. 163**

2 All documents produced or made available to Samsung by any non-party or third-party in
3 this Litigation.

4 **REQUEST NO. 164**

5 All documents relating to any security interest in or lien against any of the Samsung
6 Patents-In-Suit or any related patents.

7 **REQUEST NO. 165**

8 All documents relating to the ownership, title, transfer, or assignment of any of the
9 Samsung Patents-In-Suit or any related patents.

10 **REQUEST NO. 166**

11 All documents relating to Samsung's decision to mark or not to mark any product with
12 the numbers of any of the Samsung Patents-In-Suit.

13 **REQUEST NO. 167**

14 All documents and things related to any marking of any product with any of the numbers
15 of any of the Samsung Patents-in-Suit.

16 **REQUEST NO. 168**

17 All documents and things evidencing Samsung's or any licensee's or any third party's
18 marking of any product with the numbers of any of the Samsung Patents-in-Suit.

19 **REQUEST NO. 169**

20 All documents relating to any alleged damage or injury that Samsung has suffered or will
21 suffer as a consequence of Apple allegedly using, manufacturing, employing, or selling any
22 Apple Accused Product.

1 **REQUEST NO. 170**

2 All documents relating to any sales that Samsung alleges it has lost, or believes it has
3 lost, to Apple.

4 **REQUEST NO. 171**

5 All documents relating to budgets, projected revenues and expenses, projected sales,
6 projected profits, or other forecasts of operations concerning each Samsung Product you claim
7 embodies any invention claimed in any claim of any of the Samsung Patents-In-Suit.
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9 **REQUEST NO. 172**

10 All documents relating to Samsung's pricing, pricing practice or policies, and changes in
11 pricing with respect to each Samsung Product you claim embodies any invention claimed in any
12 claim of any of the Samsung Patents-In-Suit, including without limitation, documents concerning
13 price lists, pricing worksheets, marketing/pricing memoranda, sales correspondence, or price
14 quotations.
15

16 **REQUEST NO. 173**

17 All documents relating to Samsung's alleged capacity and ability to manufacture, sell,
18 and/or distribute each Samsung Product you claim embodies any invention claimed in any claim
19 of any of the Samsung Patents-In-Suit, including without limitation all documents and tangible
20 things concerning Samsung's sales, marketing and distribution system, sales force, and
21 geographic locations for manufacturing and warehousing operations.
22

23 **REQUEST NO. 174**

24 All documents that list, describe, detail, or concern the market for each Samsung Product
25 you claim embodies any invention claimed in any claim of any of the Samsung Patents-In-Suit,
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1 including without limitation documents concerning: (a) actual, projected, or potential market size
2 or market shares; and (b) industry trends or developments.

3 **REQUEST NO. 175**

4 All documents concerning transport channel processing technology, including but not
5 limited to segmentation, multiplexing, channel coding and interleaving that, prior to July 7, 1999,
6 was known, patented, conceived, described, used, made, created, analyzed, tested, standardized,
7 developed, or in development.

9 **REQUEST NO. 176**

10 All documents concerning transport channel processing technology developed in whole
11 or part by Samsung, whether or not implemented in a commercial product or standard. This
12 includes, but is not limited to, all documents and things concerning the conception, creation,
13 development, testing, analysis, implementation, negotiation, standardization, or selection of
14 transport channel processing technology, including without limitation all documents constituting
15 or concerning:

17 (a) Samsung's participation therein

18 (b) channel coding

19 (c) radio frame segmentation

20 (d) radio frame equalization

21 (e) transport channel multiplexing

22 (f) physical channel segmentation

23 (g) any draft or version of any specification ultimately standardized as TS
24 25.212, and any follow-on draft or version of TS 25.212

25 (h) proposals and submissions to GSM/ETSI/3GPP regarding transport
26 channel processing technology from any party, including without
27 limitation Samsung
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1
2 (i) selection of features and technologies for transport channel processing
3 technology

4 (j) any feature or technology considered, proposed, analyzed, or tested for
5 inclusion in TS 25.212

6 (k) all of Samsung's internal documentation, work, research, analysis, and
7 testing concerning transport channel processing technology

8 (l) all of Samsung's IPR declarations concerning or relating to transport
9 channel processing technology

10 (m) all of Samsung's internal documentation concerning its IPR
11 declarations concerning or relating to transport channel processing
12 technology, including for example discussion or analysis about what
13 patents to declare essential (or not declare essential) and when

14 **REQUEST NO. 177**

15 All documents, including without limitation documents constituting or concerning
16 communications within Samsung, between Samsung and any third party, constituting or
17 concerning transport channel processing technology proposed, considered for proposal,
18 conceived, created, developed, tested, analyzed, or selected for inclusion in any
19 telecommunication standard, including without limitation 3GPP TS 25.212 and TSG RAN
20 Working Group 1.

21 **REQUEST NO. 178**

22 All documents concerning data packet construction, including but not limited to
23 segmentation, concatenation, padding, length indicator optimization, pre-defined length indicator
24 values, header extension bits, and RLC-SDU alignment that, prior to May 4, 2005, was known,
25 patented, conceived, described, used, made, created, analyzed, tested, standardized, developed,
26 or in development.
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1 **REQUEST NO. 179**

2 All documents concerning data packet construction developed in whole or part by
3 Samsung, whether or not implemented in a commercial product or standard. This includes, but is
4 not limited to, all documents and things concerning the conception, creation, development,
5 testing, analysis, implementation, negotiation, standardization, or selection of data packet
6 construction, including without limitation all documents constituting or concerning:
7

- 8 (a) Samsung's participation therein;
- 9 (b) data packet segmentation;
- 10 (c) data packet concatenation;
- 11 (d) data packet padding;
- 12 (f) length indicator optimization;
- 13 (g) pre-defined length indicator values;
- 14 (h) alternative header extension bits;
- 15 (i) RLC-SDU alignment;
- 16 (j) any draft or version of any specification ultimately standardized as TS
17 25.322 and/or TS 25.306, and any follow-on draft or version of TS 25.322
18 and/or TS 25.306;
- 19 (k) proposals and submissions to GSM/ETSI/3GPP regarding data packet
20 construction from any party, including without limitation Samsung;
- 21 (l) selection of features and technologies for data packet construction;
- 22 (m) any feature or technology considered, proposed, analyzed, or tested
23 for inclusion in TS 25.322 and/or TS 25.306;
- 24 (n) all of Samsung's internal documentation, work, research, analysis, and
25 testing concerning data packet construction ;
- 26 (o) all of Samsung's IPR declarations concerning or relating to data packet
27 construction; and
- 28

1 (p) all of Samsung's internal documentation concerning its IPR
2 declarations concerning or relating to data packet construction, including
3 for example discussion or analysis about what patents to declare essential
(or not declare essential) and when.

4 **REQUEST NO. 180**

5 All documents, including without limitation documents constituting or concerning
6 communications within Samsung, between Samsung and any third party, constituting or
7 concerning data packet construction proposed, considered for proposal, conceived, created,
8 developed, tested, analyzed, or selected for inclusion in any telecommunication standard,
9 including without limitation 3GPP TS 25.322 and 3GPP TS 25.306.
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11 **REQUEST NO. 181**

12 All documents concerning uplink transmission power control technology, including but
13 not limited to enhanced uplink service, HARQ, control of transmit power or transmit power
14 factor, and power factor scaling that, prior to June 9, 2004, was known, patented, conceived,
15 described, used, made, created, analyzed, tested, standardized, developed, or in development.
16

17 **REQUEST NO. 182**

18 All documents concerning uplink transmission power control developed in whole or part
19 by Samsung, whether or not implemented in a commercial product or standard. This includes,
20 but is not limited to, all documents and things concerning the conception, creation, development,
21 testing, analysis, implementation, negotiation, standardization, or selection of data packet
22 construction, including without limitation all documents constituting or concerning:
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- 24 (a) Samsung's participation therein;
- 25 (b) HARQ;
- 26 (c) retransmission of packets;
- 27 (d) enhanced uplink dedicated channel (E-DCH);
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- 1 (f) enhanced uplink dedicated physical data channel (E-DPDCH);
2
3 (g) enhanced uplink dedicated physical control channel (E-DPCCH);
4
5 (h) power factor scaling;
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7 (i) any draft or version of any specification ultimately standardized as TS
8 25.214 and/or TS 25.213, and any follow-on draft or version of TS 25.214
9 and/or TS 25.213;
10
11 (j) proposals and submissions to GSM/ETSI/3GPP regarding uplink
12 transmission power control from any party, including without limitation
13 Samsung;
14
15 (k) selection of features and technologies for uplink transmission power
16 control;
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18 (l) any feature or technology considered, proposed, analyzed, or tested for
19 inclusion in TS 25.214 and/or TS 25.213;
20
21 (n) all of Samsung's internal documentation, work, research, analysis, and
22 testing concerning uplink transmission power control ;
23
24 (o) all of Samsung's IPR declarations concerning or relating to uplink
25 transmission power control; and
26
27 (p) all of Samsung's internal documentation concerning its IPR
28 declarations concerning or relating to uplink transmission power control,
including for example discussion or analysis about what patents to declare
essential (or not declare essential) and when.

REQUEST NO. 183

All documents, including without limitation documents constituting or concerning communications within Samsung, between Samsung and any third party, constituting or concerning uplink transmission power control proposed, considered for proposal, conceived, created, developed, tested, analyzed, or selected for inclusion in any telecommunication standard, including without limitation 3GPP TS 25.214 and 3GPP TS 25.213.

1 **REQUEST NO. 184**

2 To the extent not duplicative of other requests, all documents relating to actual or
3 potential litigation or arbitration threatened or filed by or against Samsung, including by not
4 limited to litigation or arbitration outside of the United States, regarding the licensing of any IPR
5 related to the Defined Wireless Standards, including without limitation any and all expert reports
6 and court filings, and transcripts of any deposition, hearing, or other recorded or transcribed
7 proceeding in the arbitrations or litigations.
8

9 **REQUEST NO. 185**

10 To the extent not duplicative of other requests, all documents relating to or containing
11 any claims or statements by Samsung in any litigation or judicial proceeding, including by not
12 limited to litigation or proceedings outside of the United States, regarding the licensing of IPR
13 that is claimed Essential to any Defined Wireless Standard, the determination of a FRAND
14 royalty rate for any IPR that is claimed Essential to any Defined Wireless Standard, and the
15 propriety of injunctive relief for the infringement of IPR claimed to be Essential to any Defined
16 Wireless Standard.
17

18 **REQUEST NO. 186**

19 To the extent not duplicative of other requests, all transcripts of depositions or other
20 documents containing any testimony and/or statements by Samsung, current or former Samsung
21 affiliates or employees, or experts retained by Samsung or counsel to Samsung, relating to any
22 litigation or judicial proceeding, including by not limited to litigation or proceedings outside of
23 the United States, concerning IPR claimed Essential to any Defined Wireless Standard, the
24 determination of a FRAND royalty rate for any IPR allegedly Essential to a Defined Wireless
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1 Standard, and the propriety of injunctive relief for the infringement of IPR claimed to be
2 Essential to any Defined Wireless Standard.

3 **REQUEST NO. 187**

4 To the extent not duplicative of other requests, all documents prepared by any expert,
5 including any technical, economic, marketing or licensing experts, retained by Samsung or by
6 counsel to Samsung for any litigation or judicial proceeding, including by not limited to
7 litigation or proceedings outside of the United States, concerning IPR claimed Essential to any
8 Defined Wireless Standard, the determination of a FRAND royalty rate for any IPR allegedly
9 Essential to a Defined Wireless Standard, and the propriety of injunctive relief for the
10 infringement of IPR claimed to be Essential to any Defined Wireless Standard.
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1 Dated: September 19, 2011

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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a true and correct copy of the above and foregoing
3 document has been served on September 19, 2011 by email upon the following:
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