

# EXHIBIT 3

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LTD., SAMSUNG ELECTRONICS AMERICA,

20 INC. and SAMSUNG

21 TELECOMMUNICATIONS AMERICA, LLC

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

24 APPLE INC., a California corporation,

25 Plaintiff,

26 vs.

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

28 Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S OBJECTIONS AND  
RESPONSES TO APPLE, INC.'S THIRD  
SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS AND THINGS (NOS.  
53-155)**



1 information not in Samsung’s possession, custody, or control to the extent that it defines Samsung  
2 to include “all predecessors, successors, predecessors-in-interest, successors-in-interest,  
3 subsidiaries, divisions, parents, and/or affiliates, past or present, any companies that have a  
4 controlling interest in Defendants, and any current or former employee, officer, director, principal,  
5 agent, consultant, representative, or attorney thereof, or anyone acting on their behalf.”

6 6. Samsung objects to the definition of “Apple” as overly broad.

7 7. Samsung objects to the definition of “Qualcomm” as overly broad.

8 8. Samsung objects to the definition of “Intel” as overly broad.

9 9. Samsung objects to the definition of “Defined Wireless Standards” as overly broad  
10 and overly burdensome to the extent it asks Samsung to provide information relating to standards  
11 and/or wireless standards to which the Samsung Patents-in-Suit have not been declared as  
12 Essential or relating to standards and/or wireless standards upon which Samsung does not rely in  
13 its infringement contentions.

14 10. Samsung objects to the use of the defined terms “IPR Essential to any Defined  
15 Wireless Standards” as overly broad and overly burdensome, to the extent it asks Samsung to  
16 provide information not relating to the Samsung Patents-in-Suit or not relating to the Defined  
17 Wireless Standards to which the Samsung Patents-in-Suit have been declared or are deemed  
18 Essential.

19 11. Samsung objects to the definition of “Samsung’s Alleged Essential Technology” as  
20 overly broad, and to the extent it seeks information protected from disclosure by the attorney-  
21 client privilege, attorney work product doctrine, community of interest doctrine, joint defense  
22 privilege, and/or any other applicable privilege.

23 12. Samsung objects to the definition of “Third Party” or “Third Parties” as overly  
24 broad.

25 13. Samsung objects to the definition of “Relating” as overly broad.

26 14. Samsung objects to Instruction Nos. 1 and 3 to the extent they ask for documents to  
27 be produced “without abbreviation or redaction” or “in full.” Where applicable, Samsung will  
28 redact from certain documents non-responsive, irrelevant or privileged information.

1           15.     Samsung objects to Instruction No. 2 to the extent it asks Samsung to log any  
2 privileged document dated after April 15, 2011.

3           16.     Samsung further objects to each document request to the extent it seeks highly  
4 confidential documents containing Samsung's sensitive proprietary business information, the  
5 disclosure of which could cause Samsung substantial competitive harm. Any such documents will  
6 be appropriately designated under the applicable protective order and/or redacted to exclude non-  
7 responsive, irrelevant or privileged information.

8           17.     Samsung objects to each document request to the extent it seeks documents more  
9 readily available to Apple than to Samsung, or equally available to Apple as to Samsung,  
10 including documents and things that are publicly available.

11          18.     Samsung objects to each document request to the extent that it seeks the  
12 confidential, proprietary and/or trade secret information of third parties, and to the extent it seeks  
13 information subject to non-disclosure or other confidentiality agreements between Samsung and a  
14 third party.

15          19.     Samsung objects to each document request to the extent that it seeks documents  
16 protected from disclosure by the constitutional and/or statutory privacy rights of third persons.

17          20.     Samsung objects to each document request that alleges or implies Samsung  
18 engaged in copying or other illegal activity as inappropriate harassment.

19          21.     Samsung objects to each document request to the extent that it seeks documents  
20 and things before Samsung is required to disclose such documents and things in accordance with  
21 any applicable law, such as the Northern District of California Patent Local Rules.

22          22.     Samsung objects to each document request to the extent that it seeks a legal  
23 conclusion.

24          23.     Samsung objects to each document request to the extent that it seeks to impose any  
25 requirement or discovery obligation greater or different than those imposed by the Federal Rules  
26 of Civil Procedure.

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1 Samsung. Samsung further objects to the Request to the extent the requested documents are  
2 publicly available.

3           Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 55:**

7           The file history for each foreign counterpart to the Samsung Patents-in-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

9           In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it  
11 seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
12 objects to the Request to the extent the requested documents are publicly available.

13           Subject to these objections, Samsung will produce relevant, non-privileged documents  
14 within its possession, custody, or control, if any, after conducting a reasonable search in  
15 accordance with the Patent Local Rules.

16 **REQUEST FOR PRODUCTION NO. 56:**

17           All patents or patent applications to which the Samsung Patents-in-Suit claim priority.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

19           In addition to its Objections and Responses Common to All Requests for Production,  
20 which it hereby incorporates by reference, Samsung further objects to the Request as overbroad in  
21 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further  
22 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
23 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
24 are publicly available. Samsung further objects to the Request to the extent it calls for a legal  
25 conclusion.

26           Subject to these objections, Samsung will produce relevant, non-privileged documents  
27 within its possession, custody, or control, if any, after conducting a reasonable search in  
28 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 57:**

2 All file histories of all patents or patent applications to which the Samsung Patents-in-Suit  
3 claim priority.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

5 In addition to its Objections and Responses Common to All Requests for Production,  
6 which it hereby incorporates by reference, Samsung further objects to the Request as overbroad in  
7 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further  
8 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
9 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
10 evidence. Samsung further objects to the Request to the extent it seeks documents equally or more  
11 readily available to Apple than to Samsung. Samsung further objects to the Request to the extent  
12 the requested documents are publicly available. Samsung further objects to the Request to the  
13 extent it calls for a legal conclusion.

14 Subject to these objections, Samsung will produce relevant, non-privileged documents  
15 within its possession, custody, or control, if any, after conducting a reasonable search in  
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 58:**

18 All reference and prior art cited during the prosecution of all patents or patent applications  
19 to which the Samsung Patents-in-Suit claim priority.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

21 In addition to its Objections and Responses Common to All Requests for Production,  
22 which it hereby incorporates by reference, Samsung further objects to the Request to the extent it  
23 seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
24 objects to the Request to the extent the requested documents are publicly available.

25 Subject to these objections, Samsung will produce relevant, non-privileged documents  
26 within its possession, custody, or control, if any, after conducting a reasonable search in  
27 accordance with the Patent Local Rules.

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1 **REQUEST FOR PRODUCTION NO. 59:**

2 All licenses to the Samsung Patents-in-Suit or any foreign counterparts thereto, including  
3 without limitation any such licenses held by Qualcomm or Intel.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

5 In addition to its Objections and Responses Common to All Requests for Production,  
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
10 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
11 Request to the extent it seeks documents containing confidential third party information, including  
12 information subject to a non-disclosure or other agreement between Samsung and a third party.  
13 Samsung further objects to the Request to the extent it seeks documents subject to a protective  
14 order.

15 Subject to these objections, Samsung will produce relevant, non-privileged documents  
16 within its possession, custody, or control, if any, after conducting a reasonable search in  
17 accordance with the Patent Local Rules.

18 **REQUEST FOR PRODUCTION NO. 60:**

19 All documents sufficient to identify and describe Samsung's past and present procedures  
20 and policies relating to document retention or document destruction, including without limitation  
21 documents constituting any Samsung policies, formal or informal, relating to document retention  
22 or document destruction.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

24 In addition to its Objections and Responses Common to All Requests for Production,  
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly

1 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
2 Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
3 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
4 further objects to the Request as duplicative of Apple's Request For Production No. 50.

5 Subject to these objections, Samsung will produce relevant, non-privileged documents  
6 within its possession, custody, or control, if any, after conducting a reasonable search in  
7 accordance with the Patent Local Rules.

8 **REQUEST FOR PRODUCTION NO. 61:**

9 All documents considered or relied upon in the preparation of any document filed by  
10 Samsung in this Litigation, including without limitation Samsung's Answer.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
18 as vague and ambiguous. For example, the term "considered or relied upon" is vague and  
19 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably  
20 limited as to the scope of documents and things it seeks. Samsung further objects to the Request  
21 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.  
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
24 requested documents are publicly available.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
26 relevance and scope of the information sought by this request.

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1 **REQUEST FOR PRODUCTION NO. 62:**

2 All documents that Samsung intends to rely upon to support any claim made in this  
3 Litigation, including without limitation the claims, allegations, and statements made in Samsung's  
4 Answer.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

6 In addition to its Objections and Responses Common to All Requests for Production,  
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
12 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
13 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
14 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.  
15 Samsung further objects to the Request as premature to the extent it seeks documents and things  
16 pertaining to the future course of this litigation.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 63:**

20 All organizational charts and other documents sufficient to show the reporting  
21 relationships of the Samsung Named Inventors.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

23 In addition to its Objections and Responses Common to All Requests for Production,  
24 which it hereby incorporates by reference, Samsung further objects the Request as vague and  
25 ambiguous. For example, the term "reporting relationships" is vague and ambiguous. Samsung  
26 further objects to the Request to the extent it seeks documents that are not relevant to the claims or  
27 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
28 evidence.

1           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 64:**

4           All documents relating to the conception of the subject matter of each claim of the  
5 Samsung Patents-In-Suit, including without limitation any engineering notebooks, laboratory  
6 notebooks, memoranda, design reviews, progress reports, technical reports, drawings, schematics,  
7 specifications, diagrams, data sheets, electronically stored information, diaries, calendars, test  
8 results, invention disclosures, patent prosecution records, or any other documents that Samsung  
9 contends corroborate the conception of any claim of any of the Samsung Patents-in-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

11           In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request to the extent it seeks documents that are not within the possession, custody, or control of  
18 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
19 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
20 extent the requested documents are publicly available. Samsung further objects to the Request as  
21 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
22 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
23 the extent it calls for a legal conclusion.

24           Subject to these objections, Samsung will produce relevant, non-privileged documents  
25 within its possession, custody, or control, if any, after conducting a reasonable search in  
26 accordance with the Patent Local Rules.

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1 **REQUEST FOR PRODUCTION NO. 65:**

2 All documents relating to any purported reduction to practice of the subject matter of each  
3 claim of the Samsung Patents-In-Suit, including without limitation any engineering notebooks,  
4 laboratory notebooks, memoranda, design reviews, progress reports, technical reports, drawings,  
5 schematics, specifications, diagrams, data sheets, electronically stored information, diaries,  
6 calendars, test results, invention disclosures, patent prosecution records, or any other documents  
7 that Samsung contends corroborate the reduction to practice of any claim of any of the Samsung  
8 Patents-in-Suit.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

10 In addition to its Objections and Responses Common to All Requests for Production,  
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
16 Request to the extent it seeks documents that are not within the possession, custody, or control of  
17 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
18 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
19 extent the requested documents are publicly available. Samsung further objects to the Request as  
20 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
21 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
22 the extent it calls for a legal conclusion.

23 Subject to these objections, Samsung will produce relevant, non-privileged documents  
24 within its possession, custody, or control, if any, after conducting a reasonable search in  
25 accordance with the Patent Local Rules.

26 **REQUEST FOR PRODUCTION NO. 66:**

27 All documents relating to any purported act of diligence leading to the reduction to practice  
28 of the subject matter of each claim of the Samsung Patents-In-Suit, including without limitation

1 any engineering notebooks, laboratory notebooks, memoranda, design reviews, progress reports,  
2 technical reports, drawings, data sheets, schematics, specifications, diagrams, electronically stored  
3 information, diaries, calendars, test results, invention disclosures, patent prosecution records, or  
4 any other documents that Samsung contends corroborate any act of diligence leading to the  
5 reduction to practice of any claim of any of the Samsung Patents-in-Suit.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

7 In addition to its Objections and Responses Common to All Requests for Production,  
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
11 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
12 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
13 Request to the extent it seeks documents that are not within the possession, custody, or control of  
14 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
15 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
16 extent the requested documents are publicly available. Samsung further objects to the Request as  
17 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
18 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
19 the extent it calls for a legal conclusion.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents  
21 within its possession, custody, or control, if any, after conducting a reasonable search in  
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 67:**

24 All documents relating to the research, design, development, manufacture, assembly,  
25 testing, or operation of any Product that allegedly embodies, falls within the scope of, is, or the use  
26 of which is or will be, covered by any claim of the Samsung Patents-In-Suit, including without  
27 limitation any engineering notebooks, laboratory notebooks, memoranda, design reviews, progress  
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1 reports, technical reports, drawings, schematics, specifications, diagrams, electronically stored  
2 information, diaries, calendars, or test results.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

4 In addition to its Objections and Responses Common to All Requests for Production,  
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
9 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
10 as vague and ambiguous. For example, the term “research, design, development, manufacture,  
11 assembly, testing, or operation” is vague and ambiguous. Samsung further objects to the Request  
12 as overbroad in that it is not reasonably limited as to the scope of documents and things it seeks.  
13 Samsung further objects to the Request to the extent it seeks documents that are not within the  
14 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent  
15 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
16 objects to the Request to the extent the requested documents are publicly available. Samsung  
17 further objects to the Request as premature to the extent it seeks documents and things inconsistent  
18 with the timeframes set forth in the Northern District of California Patent Local Rules.

19 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
20 relevance and scope of the information sought by this request.

21 **REQUEST FOR PRODUCTION NO. 68:**

22 For each of the Samsung Patents-In-Suit, documents sufficient to identify all persons  
23 involved in Samsung’s development of the subject matter of such patent at any time prior to the  
24 filing of the application(s) that resulted in such patent.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 68:**

26 In addition to its Objections and Responses Common to All Requests for Production,  
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
3 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
4 as vague and ambiguous. For example, the term “development of the subject matter” is vague and  
5 ambiguous. Samsung further objects to the Request as overbroad in that it is not limited to any  
6 reasonable time period and seeks documents and things from time periods not at issue in this  
7 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
8 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
9 the extent it seeks documents equally or more readily available to Apple than to Samsung.  
10 Samsung further objects to the Request to the extent the requested documents are publicly  
11 available. Samsung further objects to the Request as premature to the extent it seeks documents  
12 and things inconsistent with the timeframes set forth in the Northern District of California Patent  
13 Local Rules.

14           Subject to these objections, Samsung will produce relevant, non-privileged documents  
15 within its possession, custody, or control, if any, after conducting a reasonable search in  
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 69:**

18           All engineering notebooks, laboratory notebooks, records, logs, files, and electronically  
19 stored information generated at or by the direction of any of the Samsung Named Inventors, and  
20 all engineering notebooks, laboratory notebooks, records, logs, files, and electronically stored  
21 information in which any of the Samsung Named Inventors made any entries that pertain in any  
22 way to any of the Samsung Patents-In-Suit or the subject matter disclosed or claimed therein.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

24           In addition to its Objections and Responses Common to All Requests for Production,  
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly



1 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
2 as vague and ambiguous. For example, the terms “generated at or by the direction of” and  
3 “subject matter” is vague and ambiguous. Samsung further objects to the Request as overbroad in  
4 that it is not limited to any reasonable time period and seeks documents and things from time  
5 periods not at issue in this litigation. Samsung further objects to the Request as duplicative of  
6 Apple’s Request For Production Nos. 64, 65, 66. Samsung further objects to the Request to the  
7 extent it seeks documents that are not within the possession, custody, or control of Samsung.  
8 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
9 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
10 requested documents are publicly available. Samsung further objects to the Request as premature  
11 to the extent it seeks documents and things inconsistent with the timeframes set forth in the  
12 Northern District of California Patent Local Rules.

13 Subject to these objections, Samsung will produce relevant, non-privileged documents  
14 within its possession, custody, or control, if any, after conducting a reasonable search in  
15 accordance with the Patent Local Rules.

16 **REQUEST FOR PRODUCTION NO. 70:**

17 All documents relating to the inventorship of any claim of the Samsung Patents-In-Suit.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

19 In addition to its Objections and Responses Common to All Requests for Production,  
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
24 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
25 as vague and ambiguous. For example, the term “inventorship” is vague and ambiguous.  
26 Samsung further objects to the Request as duplicative of Apple’s Request For Production Nos. 64,  
27 65, 66, and 69. Samsung further objects to the Request to the extent it seeks documents that are  
28 not within the possession, custody, or control of Samsung. Samsung further objects to the Request

1 to the extent it seeks documents equally or more readily available to Apple than to Samsung.  
2 Samsung further objects to the Request to the extent the requested documents are publicly  
3 available. Samsung further objects to the Request as premature to the extent it seeks documents  
4 and things inconsistent with the timeframes set forth in the Northern District of California Patent  
5 Local Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents  
7 within its possession, custody, or control, if any, after conducting a reasonable search in  
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 71:**

10 All documents relating to the identification or determination of the inventors for each of  
11 the Samsung Patents-In-Suit.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 71:**

13 In addition to its Objections and Responses Common to All Requests for Production,  
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
17 applicable privilege or immunity. Samsung further objects the Request as vague and ambiguous.  
18 For example, the terms “identification” or “determination” are vague and ambiguous. Samsung  
19 further objects to the Request to the extent it is unduly burdensome, and/or would require undue  
20 expense to answer. Samsung further objects to the Request to the extent it seeks documents  
21 equally or more readily available to Apple than to Samsung. Samsung further objects to the  
22 Request to the extent the requested documents are publicly available. Samsung further objects to  
23 the Request to the extent it calls for a legal conclusion.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents  
25 within its possession, custody, or control, if any, after conducting a reasonable search in  
26 accordance with the Patent Local Rules.

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1 **REQUEST FOR PRODUCTION NO. 72:**

2 All documents relating to the contribution of each of the Samsung Named Inventors to the  
3 Samsung Patents-In-Suit.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 72:**

5 In addition to its Objections and Responses Common to All Requests for Production,  
6 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
7 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
8 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
9 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
10 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
11 as vague and ambiguous. For example, the term “contribution” is vague and ambiguous.  
12 Samsung further objects to the Request as duplicative of Apple’s Request For Production Nos. 64,  
13 65, 66, 69, 70, and 71. Samsung further objects to the Request to the extent it seeks documents  
14 that are not within the possession, custody, or control of Samsung. Samsung further objects to the  
15 Request to the extent it seeks documents equally or more readily available to Apple than to  
16 Samsung. Samsung further objects to the Request to the extent the requested documents are  
17 publicly available. Samsung further objects to the Request to the extent it calls for a legal  
18 conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents  
20 within its possession, custody, or control, if any, after conducting a reasonable search in  
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 73:**

23 All documents sent to or from any of the Samsung Named Inventors relating to the  
24 Samsung Patents-In-Suit, the prosecution of the Samsung Patents-In-Suit, and/or the subject  
25 matter of any claim of the Samsung Patents-In-Suit.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 73:**

27 In addition to its Objections and Responses Common to All Requests for Production,  
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
5 Request as duplicative of Apple's Request For Production Nos. 64, 65, 66, 69, 70, 71, and 72.  
6 Samsung further objects to the Request to the extent it seeks documents that are not within the  
7 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent  
8 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
9 objects to the Request to the extent the requested documents are publicly available. Samsung  
10 further objects to the Request as premature to the extent it seeks documents and things inconsistent  
11 with the timeframes set forth in the Northern District of California Patent Local Rules.

12 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
13 relevance and scope of the information sought by this request.

14 **REQUEST FOR PRODUCTION NO. 74:**

15 All documents relating to any affidavit or declaration ever signed, served, or filed in any  
16 proceeding by any Named Inventors or prosecutors of the Samsung Patents-In-Suit at any time,  
17 where any part of the affidavit or declaration relates to the Samsung Patents-In-Suit.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

19 In addition to its Objections and Responses Common to All Requests for Production,  
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
24 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
25 Request to the extent it seeks documents that are not within the possession, custody, or control of  
26 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
27 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
28

1 extent the requested documents are publicly available. Samsung further objects to the Request to  
2 the extent it seeks documents subject to a protective order or under seal.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 75:**

6 All documents relating to the retention and/or participation of any Named Inventor as a  
7 consultant, expert, or witness in any proceeding concerning the Samsung Patents-In-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request to the extent it seeks documents that are not within the possession, custody, or control of  
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
17 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
18 extent the requested documents are publicly available. Samsung further objects to the Request to  
19 the extent it seeks documents subject to a protective order or under seal.

20 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 76:**

23 All documents constituting or relating to any Samsung guidelines, policies, protocols, or  
24 practices for inventor or employee innovation or invention compensation.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

26 In addition to its Objections and Responses Common to All Requests for Production,  
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
4 Request as overbroad in that it seeks documents and things that pertain to products not at issue in  
5 this litigation. Samsung further objects to the Request as overbroad in that it is not limited to any  
6 reasonable time period and seeks documents and things from time periods not at issue in this  
7 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
8 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
9 discovery of admissible evidence.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 77:**

13 All documents relating to any payment or other form of compensation or remuneration  
14 made by Samsung or anyone acting on its behalf to any Named Inventor in connection with each  
15 of the Samsung Patents-in-Suit, including without limitation documents sufficient to identify the  
16 form of such payment, the amount of such payment, the date such payment was made, the identity  
17 of each person with knowledge of such payment, and the reason for such payment.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

19 In addition to its Objections and Responses Common to All Requests for Production,  
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
24 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
25 as vague and ambiguous. For example, the term “in connection with” is vague and ambiguous.  
26 Samsung further objects to the Request as overbroad in that it is not reasonably limited as to the  
27 scope of documents and things it seeks. Samsung further objects to the Request to the extent it  
28

1 seeks documents that are not relevant to the claims or defenses of any party and/or not reasonably  
2 calculated to lead to the discovery of admissible evidence.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 78:**

6 All documents relating to any payment or other form of compensation or remuneration  
7 made by Samsung or anyone acting on its behalf to any Named Inventor in connection with his or  
8 her involvement in this Litigation, including without limitation documents sufficient to identify  
9 the form of such payment, the amount of such payment, the date such payment was made, the  
10 identity of each person with knowledge of such payment, and the reason for such payment.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 78:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
18 Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
19 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
20 further objects to the Request as duplicative of Apple's Request For Production No. 77.

21 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
22 relevance and scope of the information sought by this request.

23 **REQUEST FOR PRODUCTION NO. 79:**

24 All documents, whether published or not, constituting or relating to writings, publications,  
25 abstracts, papers, presentations, memoranda, reports, or speeches authored or given by or for  
26 Samsung or any of the Named Inventors relating to the subject matter disclosed or claimed in any  
27 of the Samsung Patents-In-Suit, including without limitation such documents provided to SSOs.  
28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 79:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
8 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.  
9 Samsung further objects to the Request as overbroad in that it is not limited to any reasonable time  
10 period and seeks documents and things from time periods not at issue in this litigation. Samsung  
11 further objects to the Request to the extent it seeks documents equally or more readily available to  
12 Apple than to Samsung. Samsung further objects to the Request to the extent the requested  
13 documents are publicly available. Samsung further objects to the Request as premature to the  
14 extent it seeks documents and things inconsistent with the timeframes set forth in the Northern  
15 District of California Patent Local Rules.

16 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
17 relevance and scope of the information sought by this request.

18 **REQUEST FOR PRODUCTION NO. 80:**

19 All documents, whether published or not, constituting or relating to publications, abstracts,  
20 papers, presentations, or speeches authored relating to the subject matter disclosed or claimed in  
21 any of the Samsung Patents-In-Suit, including without limitation such documents provided to  
22 SSOs.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

24 In addition to its Objections and Responses Common to All Requests for Production,  
25 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
26 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
27 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
28 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly



1 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
2 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.  
3 Samsung further objects to the Request as overbroad in that it is not limited to any reasonable time  
4 period and seeks documents and things from time periods not at issue in this litigation. Samsung  
5 further objects to the Request to the extent the requested documents are publicly available.  
6 Samsung further objects to the Request as premature to the extent it seeks documents and things  
7 inconsistent with the timeframes set forth in the Northern District of California Patent Local  
8 Rules.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 81:**

12 All engineering notebooks, laboratory notebooks, records, logs, and files relating to the  
13 subject matter of any claim of the Samsung Patents-In-Suit.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

15 In addition to its Objections and Responses Common to All Requests for Production,  
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
20 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
21 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.  
22 Samsung further objects to the Request as overbroad in that it is not reasonably limited as to the  
23 scope of documents and things it seeks. Samsung further objects to the Request as duplicative of  
24 Apple’s Request For Production Nos. 64, 65, 66, 66, 69, 73, and 79. Samsung further objects to  
25 the Request as premature to the extent it seeks documents and things inconsistent with the  
26 timeframes set forth in the Northern District of California Patent Local Rules.

27 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
28 relevance and scope of the information sought by this request.

1 **REQUEST FOR PRODUCTION NO. 82:**

2 All documents relating to technical or scientific writings, whether published or not, that  
3 were authored by, contributed to, or given in whole or in part by Samsung or any of the Samsung  
4 Named Inventors relating to the subject matter of any of the Samsung Patents-In-Suit, including,  
5 without limitation, patents, patent applications, articles, abstracts, publications, manuscripts,  
6 papers, posters, presentations, speeches, technical disclosures, or Samsung internal technical  
7 publications.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
15 as vague and ambiguous. For example, the term “subject matter” is vague and ambiguous.  
16 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
17 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
18 requested documents are publicly available.

19 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
20 relevance and scope of the information sought by this request.

21 **REQUEST FOR PRODUCTION NO. 83:**

22 All documents relating to Samsung’s decision to seek patent protection for the subject  
23 matter of any claim of any Samsung Patent-In-Suit.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

25 In addition to its Objections and Responses Common to All Requests for Production,  
26 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
27 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
28 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other

1 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
2 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
3 Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
4 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

5 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
6 relevance and scope of the information sought by this request.

7 **REQUEST FOR PRODUCTION NO. 84:**

8 All documents relating to the preparation, filing, and/or prosecution of each of the  
9 Samsung Patents-In-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

11 In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request to the extent it seeks documents equally or more readily available to Apple than to  
18 Samsung. Samsung further objects to the Request to the extent the requested documents are  
19 publicly available.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents  
21 within its possession, custody, or control, if any, after conducting a reasonable search in  
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 85:**

24 All references and prior art cited during the prosecution of each of the Samsung Patents-In-  
25 Suit.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

27 In addition to its Objections and Responses Common to All Requests for Production,  
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
5 Request as duplicative of Apple's Request For Production Nos. 53, 56, 57, 58, and 84. Samsung  
6 further objects to the Request to the extent it seeks documents equally or more readily available to  
7 Apple than to Samsung. Samsung further objects to the Request to the extent the requested  
8 documents are publicly available.

9           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 86:**

12           All references and prior art cited during the prosecution of any foreign counterparts to the  
13 Samsung Patents-In-Suit.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

15           In addition to its Objections and Responses Common to All Requests for Production,  
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
21 Request as duplicative of Apple's Request For Production Nos. 53, 54, 55, 56, 57, 58, and 84.  
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
24 requested documents are publicly available.

25           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
26 relevance and scope of the information sought by this request.

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28

1 **REQUEST FOR PRODUCTION NO. 87:**

2 All prior art to the Samsung Patents-In-Suit and any foreign counterparts to the Samsung  
3 Patents-In-Suit in the possession, custody, or control of Samsung or the Samsung Named  
4 Inventors.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

6 In addition to its Objections and Responses Common to All Requests for Production,  
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
12 Request as duplicative of Apple's Request For Production Nos. 84, 85, and 86. Samsung further  
13 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
14 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
15 are publicly available. Samsung further objects to the Request as premature to the extent it seeks  
16 documents and things inconsistent with the timeframes set forth in the Northern District of  
17 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a  
18 legal conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents  
20 within its possession, custody, or control, if any, after conducting a reasonable search in  
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 88:**

23 All documents relating to any decision as to what reference to cite, or to not cite during the  
24 prosecution of each of the Samsung Patents-In-Suit and any foreign counterparts thereto, including  
25 without limitation all prior art search results.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

27 In addition to its Objections and Responses Common to All Requests for Production,  
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
5 Request as duplicative of Apple’s Request For Production No. 84. Samsung further objects to the  
6 Request to the extent it seeks documents equally or more readily available to Apple than to  
7 Samsung.

8 Subject to these objections, Samsung will produce relevant, non-privileged documents  
9 within its possession, custody, or control, if any, after conducting a reasonable search in  
10 accordance with the Patent Local Rules.

11 **REQUEST FOR PRODUCTION NO. 89:**

12 All documents relating to any prior art, or possible prior art, to the subject matter of any  
13 claim of the Samsung Patents-In-Suit. This includes without limitation documents or information  
14 relating to patents, publications, prior knowledge, public uses, sales, or offers for sale.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 89:**

16 In addition to its Objections and Responses Common to All Requests for Production,  
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
21 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
22 as vague and ambiguous. For example, the terms “subject matter of any claim” and “possible  
23 prior art” are vague and ambiguous. Samsung further objects to the Request as overbroad in that it  
24 is not reasonably limited as to the scope of documents and things it seeks. For example, the  
25 Request seeks “possible prior art.” Samsung further objects to the Request as duplicative of  
26 Apple’s Request For Production Nos. 84, 85, 86 and 87. Samsung further objects to the Request  
27 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.  
28 Samsung further objects to the Request to the extent it seeks documents equally or more readily

1 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
2 requested documents are publicly available. Samsung further objects to the Request as premature  
3 to the extent it seeks documents and things inconsistent with the timeframes set forth in the  
4 Northern District of California Patent Local Rules. Samsung further objects to the Request to the  
5 extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents  
7 within its possession, custody, or control, if any, after conducting a reasonable search in  
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 90:**

10 All documents relating to any evaluation, analysis, or review of any prior art relating to the  
11 Samsung Patents-In-Suit or any foreign counterparts thereto, including without limitation any  
12 documents that refer to any prior art relating to the Samsung Patents-In-Suit or any foreign  
13 counterparts thereto.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 90:**

15 In addition to its Objections and Responses Common to All Requests for Production,  
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
21 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
22 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production  
23 Nos. 84, 85, 86, 87, and 89. Samsung further objects to the Request to the extent it seeks  
24 documents equally or more readily available to Apple than to Samsung. Samsung further objects  
25 to the Request to the extent the requested documents are publicly available. Samsung further  
26 objects to the Request as premature to the extent it seeks documents and things inconsistent with  
27 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung  
28 further objects to the Request to the extent it calls for a legal conclusion.

1           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 91:**

4           All documents relating to any search for or investigation of any prior art or other  
5 information, regarding the patentability, validity, enforceability, or scope of the subject matter of  
6 any claim of each of the Samsung Patents-In-Suit and any foreign counterpart thereto.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 91:**

8           In addition to its Objections and Responses Common to All Requests for Production,  
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
13 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
14 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
15 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production  
16 Nos. 84, 85, 86, 87, and 89. Samsung further objects to the Request to the extent it seeks  
17 documents equally or more readily available to Apple than to Samsung. Samsung further objects  
18 to the Request to the extent the requested documents are publicly available. Samsung further  
19 objects to the Request as premature to the extent it seeks documents and things inconsistent with  
20 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung  
21 further objects to the Request to the extent it calls for a legal conclusion.

22           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 92:**

25           All documents relating to any communication, meeting, or contact with the U.S. Patent and  
26 Trademark Office or any foreign patent office relating to each of the Samsung Patents-In-Suit or  
27 any foreign counterparts thereto.

28



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 92:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as duplicative of Apple's Request For Production No. 84. Samsung further objects to the  
9 Request to the extent it seeks documents equally or more readily available to Apple than to  
10 Samsung. Samsung further objects to the Request to the extent the requested documents are  
11 publicly available.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents  
13 within its possession, custody, or control, if any, after conducting a reasonable search in  
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 93:**

16 All documents relating to any right, title, chain-of-title, lien, ownership, or interest  
17 (including without limitation transfer, sale, or assignment of such interest) in or relating to any  
18 Samsung Patent-In-Suit.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 93:**

20 In addition to its Objections and Responses Common to All Requests for Production,  
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
26 Request to the extent it seeks documents that are not within the possession, custody, or control of  
27 Samsung. Samsung further objects to the Request as premature to the extent it seeks documents  
28 and things inconsistent with the timeframes set forth in the Northern District of California Patent

1 Local Rules. Samsung further objects to the Request to the extent it seeks documents equally or  
2 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
3 extent the requested documents are publicly available.

4 Subject to these objections, Samsung will produce relevant, non-privileged documents  
5 within its possession, custody, or control, if any, after conducting a reasonable search in  
6 accordance with the Patent Local Rules.

7 **REQUEST FOR PRODUCTION NO. 94:**

8 All documents that Samsung contends or believes affect, limit, or bear on the interpretation  
9 and/or construction of any claims of any of the Samsung Patents-In-Suit.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 94:**

11 In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request to the extent it seeks documents equally or more readily available to Apple than to  
18 Samsung. Samsung further objects to the Request to the extent the requested documents are  
19 publicly available. Samsung further objects to the Request as premature to the extent it seeks  
20 documents and things inconsistent with the timeframes set forth in the Northern District of  
21 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a  
22 legal conclusion.

23 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
24 relevance and scope of the information sought by this request.

25 **REQUEST FOR PRODUCTION NO. 95:**

26 All documents on which Samsung intends to rely in support of any proposed interpretation  
27 and/or construction of any claims of any of the Samsung Patents-In-Suit.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 95:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request to the extent it seeks documents that are not within the possession, custody, or control of  
9 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
10 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
11 extent the requested documents are publicly available. Samsung further objects to the Request as  
12 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
13 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
14 the extent it calls for a legal conclusion.

15 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
16 relevance and scope of the information sought by this request.

17 **REQUEST FOR PRODUCTION NO. 96:**

18 All documents relating to any unique or specialized meaning (i.e., different from its  
19 everyday common use) of any word or phrase contained in any claim of any of the Samsung  
20 Patents-In-Suit.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 96:**

22 In addition to its Objections and Responses Common to All Requests for Production,  
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
27 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
28 Request to the extent it seeks documents that are not within the possession, custody, or control of

1 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
2 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
3 extent the requested documents are publicly available. Samsung further objects to the Request as  
4 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
5 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
6 the extent it calls for a legal conclusion.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 97:**

10 All documents relating to the level of ordinary skill in the art to which the subject matter of  
11 any Samsung Patent-In-Suit pertains, including without limitation each document upon which  
12 Samsung intends to rely in this Litigation to establish the level of ordinary skill in the art.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 97:**

14 In addition to its Objections and Responses Common to All Requests for Production,  
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
20 Request to the extent it seeks documents that are not within the possession, custody, or control of  
21 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
22 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
23 extent the requested documents are publicly available. Samsung further objects to the Request as  
24 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
25 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
26 the extent it calls for a legal conclusion.

27  
28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 98:**

5 All documents relating to the patentability, validity, enforceability, or scope of any claim  
6 of the Samsung Patents-In-Suit. This includes without limitation any documents relating to studies  
7 or opinions relating to patentability, enforceability, or scope; or, to any assertion by any person  
8 that the patent is valid, invalid, enforceable, or unenforceable.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 98:**

10 In addition to its Objections and Responses Common to All Requests for Production,  
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
16 Request to the extent it seeks documents that are not within the possession, custody, or control of  
17 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
18 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
19 extent the requested documents are publicly available. Samsung further objects to the Request as  
20 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
21 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
22 the extent it calls for a legal conclusion.

23 Subject to these objections, Samsung will produce relevant, non-privileged documents  
24 within its possession, custody, or control, if any, after conducting a reasonable search in  
25 accordance with the Patent Local Rules.

26 **REQUEST FOR PRODUCTION NO. 99:**

27 All documents relating to any mode of practicing the subject matter of each claim of the  
28 Samsung Patents-In-Suit, including without limitation the best mode.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 99:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
9 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within  
10 the possession, custody, or control of Samsung. Samsung further objects to the Request to the  
11 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung  
12 further objects to the Request to the extent the requested documents are publicly available.  
13 Samsung further objects to the Request as premature to the extent it seeks documents and things  
14 inconsistent with the timeframes set forth in the Northern District of California Patent Local  
15 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

16 Subject to these objections, Samsung will produce relevant, non-privileged documents  
17 within its possession, custody, or control, if any, after conducting a reasonable search in  
18 accordance with the Patent Local Rules.

19 **REQUEST FOR PRODUCTION NO. 100:**

20 All documents relating to each mode, feature, aspect, or alternative design, which is not  
21 disclosed in the specifications of the Samsung Patents-In-Suit, but which allegedly embodies, falls  
22 within the scope of, or is made in accordance with any claim of, the Samsung Patents-In-Suit or  
23 any Related Patents.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 100:**

25 In addition to its Objections and Responses Common to All Requests for Production,  
26 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
27 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
28 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other

1 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
2 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
3 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
4 seeks. Samsung further objects to the Request as duplicative of Apple's Request For Production  
5 No. 99. Samsung further objects to the Request to the extent it seeks documents that are not  
6 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
7 the extent it seeks documents equally or more readily available to Apple than to Samsung.  
8 Samsung further objects to the Request to the extent the requested documents are publicly  
9 available. Samsung further objects to the Request as premature to the extent it seeks documents  
10 and things inconsistent with the timeframes set forth in the Northern District of California Patent  
11 Local Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents  
13 within its possession, custody, or control, if any, after conducting a reasonable search in  
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 101:**

16 All documents relating to any written description of any claim of any of the Samsung  
17 Patents-In-Suit, including without limitation all invention disclosures or invention reports and  
18 other written descriptions authored by any of the Samsung Named Inventors.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 101:**

20 In addition to its Objections and Responses Common to All Requests for Production,  
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
26 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
27 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within  
28 the possession, custody, or control of Samsung. Samsung further objects to the Request to the

1 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung  
2 further objects to the Request to the extent the requested documents are publicly available.  
3 Samsung further objects to the Request as premature to the extent it seeks documents and things  
4 inconsistent with the timeframes set forth in the Northern District of California Patent Local  
5 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

6 Subject to these objections, Samsung will produce relevant, non-privileged documents  
7 within its possession, custody, or control, if any, after conducting a reasonable search in  
8 accordance with the Patent Local Rules.

9 **REQUEST FOR PRODUCTION NO. 102:**

10 All documents relating to the first disclosure to a person (whether employed by Samsung  
11 or not), other than a Samsung Named Inventor, of the subject matter of any claim of the Samsung  
12 Patents-In-Suit.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 102:**

14 In addition to its Objections and Responses Common to All Requests for Production,  
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
20 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
21 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within  
22 the possession, custody, or control of Samsung. Samsung further objects to the Request to the  
23 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung  
24 further objects to the Request to the extent the requested documents are publicly available.  
25 Samsung further objects to the Request as premature to the extent it seeks documents and things  
26 inconsistent with the timeframes set forth in the Northern District of California Patent Local  
27 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

28



1           Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 103:**

5           All documents relating to the first public disclosure, first public use, first public  
6 demonstration, first offer for sale, and/or first sale of the subject matter claimed in any claim of a  
7 Samsung Patent-In-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 103:**

9           In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request to the extent it seeks documents that are not within the possession, custody, or control of  
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
17 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
18 extent the requested documents are publicly available. Samsung further objects to the Request as  
19 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
20 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
21 the extent it calls for a legal conclusion.

22           Subject to these objections, Samsung will produce relevant, non-privileged documents  
23 within its possession, custody, or control, if any, after conducting a reasonable search in  
24 accordance with the Patent Local Rules.

25 **REQUEST FOR PRODUCTION NO. 104:**

26           For each of the Samsung Patents-In-Suit, all documents relating to any disclosure or  
27 publication of the subject matter of any claim of such patent sent to, shared with, or disseminated  
28 to any person or entity other than Samsung before the filing date of such patent, including without

1 limitation any pre-filing date sales, offers for sale, public uses, demonstrations, announcements,  
2 advertisements, or publications.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 104:**

4 In addition to its Objections and Responses Common to All Requests for Production,  
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
10 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
11 seeks. Samsung further objects to the Request to the extent it seeks documents that are not within  
12 the possession, custody, or control of Samsung. Samsung further objects to the Request to the  
13 extent it seeks documents equally or more readily available to Apple than to Samsung. Samsung  
14 further objects to the Request to the extent the requested documents are publicly available.  
15 Samsung further objects to the Request as premature to the extent it seeks documents and things  
16 inconsistent with the timeframes set forth in the Northern District of California Patent Local  
17 Rules. Samsung further objects to the Request to the extent it calls for a legal conclusion.

18 Subject to these objections, Samsung will produce relevant, non-privileged documents  
19 within its possession, custody, or control, if any, after conducting a reasonable search in  
20 accordance with the Patent Local Rules.

21 **REQUEST FOR PRODUCTION NO. 105:**

22 Documents sufficient to identify and show in detail each design around, alternative  
23 manufacturing process, and/or alternative technology or method that can be used as a commercial  
24 alternative to the patented technology of each of the Samsung Patents-In-Suit.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 105:**

26 In addition to its Objections and Responses Common to All Requests for Production,  
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
4 Request to the extent it seeks documents that are not within the possession, custody, or control of  
5 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
6 more readily available to Apple than to Samsung. Samsung further objects to the Request to the  
7 extent the requested documents are publicly available. Samsung further objects to the Request as  
8 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
9 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
10 the extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it  
11 calls for a legal conclusion.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents  
13 within its possession, custody, or control, if any, after conducting a reasonable search in  
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 106:**

16 All minutes, memoranda, notes, or other documents relating to any discussions or  
17 negotiations for licenses to, covenants not to sue to, or rights to practice any Samsung Patent-in-  
18 Suit.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 106:**

20 In addition to its Objections and Responses Common to All Requests for Production,  
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
26 Request to the extent it seeks documents that are not within the possession, custody, or control of  
27 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
28 more readily available to Apple than to Samsung. Samsung further objects to the Request to the

1 extent the requested documents are publicly available. Samsung further objects to the Request to  
2 the extent it seeks documents containing confidential third party information, including  
3 information subject to a non-disclosure or other agreement between Samsung and a third party.  
4 Samsung further objects to the Request to the extent it seeks documents subject to a protective  
5 order or under seal.

6 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
7 relevance and scope of the information sought by this request.

8 **REQUEST FOR PRODUCTION NO. 107:**

9 Documents sufficient to identify all people who have communicated with Apple regarding  
10 any Samsung Patent-in-Suit.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 107:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
19 seeks. Samsung further objects to the Request to the extent it seeks documents that are not  
20 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
21 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks  
22 documents that are not within the possession, custody, or control of Samsung. Samsung further  
23 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
24 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
25 are publicly available. Samsung further objects to this request as oppressive and harassing  
26 inasmuch as it implies Samsung engaged in copying and other illegal activity. Samsung further  
27 objects to the Request to the extent it seeks documents containing confidential third party  
28

1 information, including information subject to a non-disclosure or other agreement between  
2 Samsung and a third party.

3           Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 108:**

7           All documents relating to communications between Samsung and Apple relating to any  
8 Patent-in-Suit. This request includes without limitation any discussion concerning licensing or  
9 alleged infringement.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 108:**

11           In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request to the extent it seeks documents that are not within the possession, custody, or control of  
18 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
19 more readily available to Apple than to Samsung.

20           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
21 relevance and scope of the information sought by this request.

22 **REQUEST FOR PRODUCTION NO. 109:**

23           All documents relating to any notice given by Samsung to Apple about any Samsung  
24 Patent-in-Suit, including without limitation any notice reflecting Samsung's contention that Apple  
25 was or is infringing any of the Samsung Patents-In-Suit. This request includes without limitation  
26 any communications between the parties or their representatives on the issue of such notice or on  
27 the issue of alleged infringement.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 109:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as duplicative of Apple's Request For Production No. 108. Samsung further objects to  
9 the Request to the extent it seeks documents that are not within the possession, custody, or control  
10 of Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
11 more readily available to Apple than to Samsung.

12 Subject to these objections, Samsung will produce relevant, non-privileged documents  
13 within its possession, custody, or control, if any, after conducting a reasonable search in  
14 accordance with the Patent Local Rules.

15 **REQUEST FOR PRODUCTION NO. 110:**

16 All documents relating to plans, suggestions, decisions, discussions, or contemplated  
17 action regarding the bringing or institution of this or any action for alleged patent infringement  
18 against Apple, including without limitation all corporate minutes and all other documents and  
19 things concerning meetings of the Board of Directors, Executive Committee, other board  
20 committees, stockholders or any other of Samsung's corporate boards, committees, or  
21 subcommittees.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 110:**

23 In addition to its Objections and Responses Common to All Requests for Production,  
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
28 burdensome, and/or would require undue expense to answer.

1 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 111:**

4 All documents relating to any communication between Samsung and any other person or  
5 entity concerning the alleged infringement by Apple of any Samsung Patent-in-Suit.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 111:**

7 In addition to its Objections and Responses Common to All Requests for Production,  
8 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
9 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
10 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
11 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
12 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
13 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
14 seeks. Samsung further objects to the Request to the extent it seeks documents that are not  
15 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
16 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks  
17 documents that are not within the possession, custody, or control of Samsung. Samsung further  
18 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
19 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
20 are publicly available. Samsung further objects to the Request to the extent it seeks documents  
21 containing confidential third party information, including information subject to a non-disclosure  
22 or other agreement between Samsung and a third party.

23 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
24 relevance and scope of the information sought by this request.

25 **REQUEST FOR PRODUCTION NO. 112:**

26 To the extent not duplicative of previous requests, all documents relating to any alleged  
27 infringement or willful infringement of any Samsung Patent-in-Suit by Apple.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 112:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as premature to the extent it seeks documents and things inconsistent with the timeframes  
9 set forth in the Northern District of California Patent Local Rules. Samsung further objects to the  
10 Request to the extent it calls for a legal conclusion.

11 Subject to these objections, Samsung will produce relevant, non-privileged documents  
12 within its possession, custody, or control, if any, after conducting a reasonable search in  
13 accordance with the Patent Local Rules.

14 **REQUEST FOR PRODUCTION NO. 113:**

15 All documents relating to any policy, practice, custom, guideline, or procedure of Samsung  
16 with respect to licensing patents or any intellectual property.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 113:**

18 In addition to its Objections and Responses Common to All Requests for Production,  
19 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
20 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
21 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
22 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
23 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
24 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
25 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
26 reasonable time period and seeks documents and things from time periods not at issue in this  
27 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
28 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the



1 discovery of admissible evidence. Samsung further objects to the Request to the extent it seeks  
2 documents containing confidential third party information, including information subject to a non-  
3 disclosure or other agreement between Samsung and a third party.

4 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
5 relevance and scope of the information sought by this request.

6 **REQUEST FOR PRODUCTION NO. 114:**

7 All documents relating to any valuation of any Samsung Patent-in-Suit.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 114:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request to the extent it seeks documents that are not within the possession, custody, or control of  
16 Samsung. Samsung further objects to the Request to the extent it seeks documents equally or  
17 more readily available to Apple than to Samsung. Samsung further objects to the Request as  
18 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
19 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
20 the extent it seeks documents containing confidential third party information, including  
21 information subject to a non-disclosure or other agreement between Samsung and a third party.

22 Subject to these objections, Samsung will produce relevant, non-privileged documents  
23 within its possession, custody, or control, if any, after conducting a reasonable search in  
24 accordance with the Patent Local Rules.

25 **REQUEST FOR PRODUCTION NO. 115:**

26 Documents sufficient to show royalties and any other payments paid to Samsung by each  
27 licensee or sublicensee, on a quarterly and annual basis, pursuant to any license or sublicense  
28

1 granted under any of the Samsung Patents-In-Suit or under a portfolio including any Samsung  
2 Patent-In-Suit

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 115:**

4 In addition to its Objections and Responses Common to All Requests for Production,  
5 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
6 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
7 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
8 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
9 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
10 Request as duplicative of Apple’s Request For Production No. 121. Samsung further objects to  
11 the Request to the extent it seeks documents containing confidential third party information,  
12 including information subject to a non-disclosure or other agreement between Samsung and a third  
13 party.

14 Subject to these objections, Samsung will produce relevant, non-privileged documents  
15 within its possession, custody, or control, if any, after conducting a reasonable search in  
16 accordance with the Patent Local Rules.

17 **REQUEST FOR PRODUCTION NO. 116:**

18 Documents sufficient to identify all persons involved in licensing the Samsung Patents-In-  
19 Suit.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 116:**

21 In addition to its Objections and Responses Common to All Requests for Production,  
22 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
23 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
24 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
25 applicable privilege or immunity. Samsung objects to the term “involved in” as vague and  
26 ambiguous. Samsung further objects to the Request to the extent it is unduly burdensome, and/or  
27 would require undue expense to answer. Samsung further objects to the Request to the extent it  
28

1 seeks documents containing confidential third party information, including information subject to  
2 a non-disclosure or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 117:**

7 All documents provided to Samsung's licensees regarding the use, design, development,  
8 testing, manufacture, and operation of any product embodying the invention claimed in any claim  
9 of any Samsung Patent-In-Suit, including without limitation instruction product manuals, data  
10 sheets, installation manuals, retail kits, diagnostic software, installation software, or specifications.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 117:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
19 seeks. Samsung further objects to the term "licensees" as vague, ambiguous and overly broad, and  
20 interprets the term to mean "licensees of any Samsung Patent-In-Suit." Samsung further objects to  
21 the Request to the extent it seeks documents that are not within the possession, custody, or control  
22 of Samsung. Samsung further objects to the Request to the extent it seeks documents containing  
23 confidential third party information, including information subject to a non-disclosure or other  
24 agreement between Samsung and a third party.

25 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
26 relevance and scope of the information sought by this request.

27  
28

1 **REQUEST FOR PRODUCTION NO. 118:**

2 All documents relating to the research, design, development, structure, operation,  
3 performance, assembly, manufacture, packaging, use, testing, sampling, importation, sale, or offer  
4 for sale of any product or process (a) that is licensed under any Samsung Patent-in-Suit, or (b) that  
5 allegedly practices, incorporates, or embodies any claim of any Samsung Patent-in-Suit. This  
6 includes without limitation engineering notebooks, lab notebooks, blueprints, design reports,  
7 illustrations, diagrams, test specifications, data sheets, flow charts, drawings, specifications,  
8 control drawings, sales outline drawings, engineering documents, schematic diagrams, process  
9 schematics, design documents, project books, project files, manufacturing documents,  
10 procurement documents (including all invoices), requests for proposals, requests for quotations,  
11 and correspondence for all versions of any prototype, prototypes, engineering models, or other  
12 physical models.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 118:**

14 In addition to its Objections and Responses Common to All Requests for Production,  
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
19 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
20 as vague and ambiguous. For example, the term “process” is vague and ambiguous. Samsung  
21 further objects to the Request as overbroad in that it is not reasonably limited as to the scope of  
22 documents and things it seeks. Samsung further objects to the Request as overbroad in that it  
23 seeks documents and things that pertain to products not at issue in this litigation. Samsung further  
24 objects to the Request as overbroad in that it seeks documents and things that bear on occurrences  
25 in other countries that are not at issue in this litigation. Samsung further objects to the Request as  
26 overbroad in that it is not limited to any reasonable time period and seeks documents and things  
27 from time periods not at issue in this litigation. Samsung further objects to the Request to the  
28 extent it seeks documents that are not within the possession, custody, or control of Samsung.

1 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
2 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
3 requested documents are publicly available. Samsung further objects to the Request as premature  
4 to the extent it seeks documents and things inconsistent with the timeframes set forth in the  
5 Northern District of California Patent Local Rules. Samsung further objects to the Request to the  
6 extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it seeks  
7 documents containing confidential third party information, including information subject to a non-  
8 disclosure or other agreement between Samsung and a third party.

9           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 119:**

12           All documents concerning or comprising licenses of or agreements to license any IPR  
13 related to any of the Defined Wireless Standards, including without limitation licenses of such IPR  
14 from Samsung to third parties and licenses of such IPR from third parties to Samsung.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 119:**

16           In addition to its Objections and Responses Common to All Requests for Production,  
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
21 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
22 as vague and ambiguous. For example, the term “IPR” is vague and ambiguous. Samsung further  
23 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”  
24 Samsung further objects to the Request to the extent it seeks documents that are not within the  
25 possession, custody, or control of Samsung. Samsung further objects to the Request to the extent  
26 it seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
27 objects to the Request to the extent the requested documents are publicly available. Samsung  
28 further objects to the Request to the extent it seeks documents containing confidential third party

1 information, including information subject to a non-disclosure or other agreement between  
2 Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 120:**

7 All documents relating to the negotiation of any license of or agreement to license any  
8 technology allegedly Essential to any Defined Wireless Standards, including without limitation,  
9 documents reflecting discussions between the parties, licensing presentations, claim charts, and  
10 documents identifying the Samsung personnel who negotiated or authorized any such licenses or  
11 license agreement.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 120:**

13 In addition to its Objections and Responses Common to All Requests for Production,  
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
17 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
18 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
19 as vague and ambiguous. For example, the term “IPR” is vague and ambiguous. Samsung  
20 further objects to the Request as overbroad in that it is not limited to any reasonable time period  
21 and seeks documents and things from time periods not at issue in this litigation. Samsung further  
22 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”  
23 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
24 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
25 admissible evidence. Samsung further objects to the Request to the extent it seeks documents that  
26 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
27 Request to the extent it seeks documents equally or more readily available to Apple than to  
28 Samsung. Samsung further objects to the Request to the extent the requested documents are

1 publicly available. Samsung further objects to the Request to the extent it seeks documents  
2 containing confidential third party information, including information subject to a non-disclosure  
3 or other agreement between Samsung and a third party.

4 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
5 relevance and scope of the information sought by this request.

6 **REQUEST FOR PRODUCTION NO. 121:**

7 Documents sufficient to show all royalty amounts and royalty payments on any license  
8 identified in response to any Apple document request, including but not limited to the royalties  
9 Samsung has collected for any of Samsung's Alleged Essential Technology related to any of the  
10 Defined Wireless Standards.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 121:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
18 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
19 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
20 reasonable time period and seeks documents and things from time periods not at issue in this  
21 litigation. Samsung further objects to the Request as overly burdensome for its use of the terms  
22 "Samsung's Alleged Essential Technology" and "Defined Wireless Standards." Samsung further  
23 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
24 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
25 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
26 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
27 the extent the requested documents are publicly available. Samsung further objects to the Request  
28

1 to the extent it seeks documents containing confidential third party information, including  
2 information subject to a non-disclosure or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 122:**

7 All documents relating to or constituting any potential or actual agreement-whether formal  
8 or informal-among Samsung and any third party or third parties to refrain from disclosing the  
9 terms of any license to any patent claimed to be Essential to any Defined Wireless Standards to  
10 any non-party to the license agreement.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 122:**

12 In addition to its Objections and Responses Common to All Requests for Production,  
13 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
14 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
15 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
16 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
17 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
18 as vague and ambiguous. For example, the term "potential or actual agreement" is vague and  
19 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably  
20 limited as to the scope of documents and things it seeks. Samsung further objects to the Request  
21 as overly burdensome for its use of the term "Defined Wireless Standards." Samsung further  
22 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
23 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
24 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
25 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
26 the extent it calls for a legal conclusion. Samsung further objects to the Request to the extent it  
27 seeks documents containing confidential third party information, including information subject to  
28 a non-disclosure or other agreement between Samsung and a third party.



1 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
2 relevance and scope of the information sought by this request.

3 **REQUEST FOR PRODUCTION NO. 123:**

4 All documents relating to the evaluation, valuation, or attempt to estimate the actual or  
5 potential value of any patent portfolio or individual patent that is claimed by the patentee to be  
6 Essential, in whole or in part, to any of the Defined Wireless Standards, including without  
7 limitation documents relating to the technical merit of any such patents or patent portfolios, and  
8 estimates of the strength or value of any such patents or patent portfolios.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 123:**

10 In addition to its Objections and Responses Common to All Requests for Production,  
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
16 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
17 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
18 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further  
19 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
20 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
21 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
22 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
23 the extent it seeks documents equally or more readily available to Apple than to Samsung.  
24 Samsung further objects to the Request to the extent the requested documents are publicly  
25 available. Samsung further objects to the Request to the extent it seeks documents containing  
26 confidential third party information, including information subject to a non-disclosure or other  
27 agreement between Samsung and a third party.

28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 124:**

5 All documents concerning or comprising covenants not to sue on any IPR relating to any  
6 of the Defined Wireless Standards.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 124:**

8 In addition to its Objections and Responses Common to All Requests for Production,  
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
13 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
14 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
15 seeks. For example, the Request seeks agreements between parties having no relation to this  
16 litigation. Samsung further objects to the Request as overbroad in that it is not limited to any  
17 reasonable time period and seeks documents and things from time periods not at issue in this  
18 litigation. Samsung further objects to the Request as overly burdensome for its use of the term  
19 “Defined Wireless Standards.” Samsung further objects to the Request to the extent it seeks  
20 documents that are not relevant to the claims or defenses of any party and/or not reasonably  
21 calculated to lead to the discovery of admissible evidence. Samsung further objects to the Request  
22 to the extent it seeks documents that are not within the possession, custody, or control of Samsung.  
23 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
24 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
25 requested documents are publicly available. Samsung further objects to the Request to the extent  
26 it seeks documents containing confidential third party information, including information subject  
27 to a non-disclosure or other agreement between Samsung and a third party.

28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 125:**

5 Documents sufficient to show all sales, assignments, distributions, grants, or other  
6 disbursements by Samsung of ownership rights in IPR that Samsung claims, has claimed, believes,  
7 or has believed are, or were at any point, Essential to any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 125:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
16 and things from time periods not at issue in this litigation. Samsung further objects the Request as  
17 vague and ambiguous. For example, the term “sales, assignments, distributions, grants, or other  
18 disbursements” is vague and ambiguous. Samsung further objects to the Request as overbroad in  
19 that it is not reasonably limited as to the scope of documents and things it seeks. Samsung further  
20 objects to the Request as overly burdensome for its use of the term “Defined Wireless Standards.”  
21 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
22 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
23 admissible evidence. Samsung further objects to the Request to the extent it seeks documents that  
24 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
25 Request to the extent the requested documents are publicly available. Samsung further objects to  
26 the Request to the extent it seeks documents containing confidential third party information,  
27 including information subject to a non-disclosure or other agreement between Samsung and a third  
28 party.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 126:**

5 Documents sufficient to show all purchases or other acquisitions by Samsung of ownership  
6 rights in IPR that Samsung claims, has claimed, believes, or has believed are, or were at any point,  
7 Essential to any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 126:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
16 and things from time periods not at issue in this litigation. Samsung further objects the Request as  
17 vague and ambiguous. For example, the term “purchases or other acquisitions” is vague and  
18 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably  
19 limited as to the scope of documents and things it seeks. Samsung further objects to the Request  
20 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further  
21 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
22 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
23 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
24 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
25 the extent the requested documents are publicly available. Samsung further objects to the Request  
26 to the extent it seeks documents containing confidential third party information, including  
27 information subject to a non-disclosure or other agreement between Samsung and a third party.

28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 127:**

5 All documents relating to discussions between Samsung and Apple relating to the licensing  
6 of patents claimed to be Essential to any Defined Wireless Standards and patents not claimed to be  
7 Essential to any Defined Wireless Standards, including without limitation requests from Samsung  
8 to license Apple's patents, offers from Samsung to license Samsung's patents, requests from  
9 Apple to license Samsung's patents, offers from Apple to license Apple's patents, responses to  
10 any such requests and offers, analyses or discussions of royalties, valuations or attempts to  
11 estimate the actual or potential value of the license requested or offered, applicable revenue  
12 streams and projections, and Samsung's requests for an option to license certain of Apple's patents  
13 at a later date.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 127:**

15 In addition to its Objections and Responses Common to All Requests for Production,  
16 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
17 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
18 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
19 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
20 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
21 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
22 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
23 as overly burdensome for its use of the term "Defined Wireless Standards." Samsung further  
24 objects to the Request to the extent it seeks documents that are not within the possession, custody,  
25 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents  
26 equally or more readily available to Apple than to Samsung. Samsung further objects to the  
27 Request as premature to the extent it seeks documents and things inconsistent with the timeframes  
28

1 set forth in the Northern District of California Patent Local Rules. Samsung further objects to the  
2 Request to the extent it calls for a legal conclusion.

3           Subject to these objections, Samsung will produce relevant, non-privileged documents  
4 within its possession, custody, or control, if any, after conducting a reasonable search in  
5 accordance with the Patent Local Rules.

6 **REQUEST FOR PRODUCTION NO. 128:**

7           All documents relating to Samsung's understanding of the meaning of RAND licensing  
8 terms, including without limitation statements to SSOs, statements in litigation, statements to  
9 actual or potential licensees, and/or presentations or other statements made in public fora.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 128:**

11           In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
18 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
19 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
20 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
21 objects to the Request as premature to the extent it seeks documents and things inconsistent with  
22 the timeframes set forth in the Northern District of California Patent Local Rules. Samsung  
23 further objects to the Request to the extent it calls for a legal conclusion.

24           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
25 relevance and scope of the information sought by this request.

26 **REQUEST FOR PRODUCTION NO. 129:**

27           All documents relating to actual, proposed, contemplated, or appropriate FRAND royalty  
28 rates for any of Samsung's Alleged Essential Technology.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 129:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
10 as overly burdensome for its use of the term “Samsung’s Alleged Essential Technology.”  
11 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
12 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
13 admissible evidence. Samsung further objects to the Request to the extent it seeks documents  
14 containing confidential third party information, including information subject to a non-disclosure  
15 or other agreement between Samsung and a third party. Samsung further objects to the Request as  
16 premature to the extent it seeks documents and things inconsistent with the timeframes set forth in  
17 the Northern District of California Patent Local Rules. Samsung further objects to the Request to  
18 the extent it calls for a legal conclusion.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents  
20 within its possession, custody, or control, if any, after conducting a reasonable search in  
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 130:**

23 All documents concerning discussions between or among Samsung and any other ETSI  
24 member regarding (i) the grant of royalty-free cross licenses for IPR claimed to be essential to any  
25 of the Defined Wireless Standards; (ii) the FRAND royalty rates to be charged or paid for licenses  
26 to IPR claimed to be essential to any of the Defined Wireless Standards; and/or (iii) any actual or  
27 potential cumulative royalty cap of 5% or otherwise (and any components thereof) on royalties  
28 paid for IPR claimed to be essential to any of the Defined Wireless Standards.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 130:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
10 as overly burdensome for its use of the term “Defined Wireless Standards.” Samsung further  
11 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
12 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
13 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
14 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
15 the extent it seeks documents equally or more readily available to Apple than to Samsung.  
16 Samsung further objects to the Request to the extent it seeks documents containing confidential  
17 third party information, including information subject to a non-disclosure or other agreement  
18 between Samsung and a third party.

19 Subject to these objections, Samsung will produce relevant, non-privileged documents  
20 within its possession, custody, or control, if any, after conducting a reasonable search in  
21 accordance with the Patent Local Rules.

22 **REQUEST FOR PRODUCTION NO. 131:**

23 All documents relating to or comprising communications, statements, submissions, or  
24 presentations by Samsung regarding licensor demands-including demands made by Samsung for  
25 licenses of patents not Essential to any standard in exchange for a license to some or all of the  
26 licensor’s—including Samsung’s—patents that are claimed to be Essential to a standard.

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28



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 131:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
10 since it is vague and ambiguous, and it is unclear what information Apple seeks. Samsung further  
11 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
12 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
13 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
14 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
15 the extent it seeks documents containing confidential third party information, including  
16 information subject to a non-disclosure or other agreement between Samsung and a third party.

17 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 132:**

20 All documents concerning any actual or potential resistance, reluctance or refusal by any  
21 person participating in the standardization process for any Defined Wireless Standard not to  
22 license its IPR to others on FRAND terms, including without limitation documents concerning  
23 Samsung's reaction and positions, public statements by Samsung, and any internal discussions  
24 within Samsung concerning any such resistance, reluctance or refusal.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 132:**

26 In addition to its Objections and Responses Common to All Requests for Production,  
27 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
28 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney

1 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
2 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
3 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
4 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
5 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
6 as overly burdensome for its use of the overly broad term “Defined Wireless Standards.”  
7 Samsung further objects to the Request since it is vague and ambiguous, and it is unclear what  
8 information Apple seeks. Samsung further objects to the Request to the extent it seeks documents  
9 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead  
10 to the discovery of admissible evidence. Samsung further objects to the Request to the extent it  
11 seeks documents that are not within the possession, custody, or control of Samsung. Samsung  
12 further objects to the Request to the extent it seeks documents containing confidential third party  
13 information, including information subject to a non-disclosure or other agreement between  
14 Samsung and a third party.

15           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
16 relevance and scope of the information sought by this request.

17 **REQUEST FOR PRODUCTION NO. 133:**

18           All documents relating to industry customs, practices, or policies with respect to the  
19 licensing of patents claimed to be Essential to any standard that covers Mobile Wireless  
20 Telecommunications Devices.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 133:**

22           In addition to its Objections and Responses Common to All Requests for Production,  
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
27 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
28 as vague and ambiguous. For example, the term “industry customs, practices, or policies” is

1 vague and ambiguous. Samsung further objects to the Request as overbroad in that it seeks  
2 documents and things that pertain to products not at issue in this litigation. Samsung further  
3 objects to the Request as overly burdensome for its use of the overly broad term “any standard that  
4 covers Mobile Wireless Telecommunications Devices.” Samsung further objects to the Request as  
5 overbroad in that it is not limited to any reasonable time period and seeks documents and things  
6 from time periods not at issue in this litigation. Samsung further objects to the Request to the  
7 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not  
8 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to  
9 the Request as premature to the extent it seeks documents and things inconsistent with the  
10 timeframes set forth in the Northern District of California Patent Local Rules. Samsung further  
11 objects to the Request to the extent it calls for a legal conclusion.

12           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
13 relevance and scope of the information sought by this request.

14 **REQUEST FOR PRODUCTION NO. 134:**

15           All documents relating to any Samsung plan, whether adopted or not, for the development,  
16 marketing or licensing of IPR that is Essential or allegedly Essential to any of the Defined  
17 Wireless Standards, including without limitation, business plans, short-term and long-range  
18 strategies and objectives, budgets and financial projections, research and development plans,  
19 technology licensing plans, valuations or attempts to estimate the actual or potential value of the  
20 license, and presentations to management committees, executive committees, and boards of  
21 directors.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 134:**

23           In addition to its Objections and Responses Common to All Requests for Production,  
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
28 burdensome, and/or would require undue expense to answer. Samsung further objects to the

1 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
2 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
3 as overly burdensome for its use of the terms “any Samsung plan, whether adopted or not” and  
4 “IPR that is Essential or allegedly Essential to any of the Defined Wireless Standards.” Samsung  
5 further objects to the Request to the extent it seeks documents that are not relevant to the claims or  
6 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
7 evidence. Samsung further objects to the Request to the extent it seeks highly confidential  
8 documents containing sensitive proprietary business information, the disclosure of which would  
9 cause Samsung substantial competitive harm.

10 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
11 relevance and scope of the information sought by this request.

12 **REQUEST FOR PRODUCTION NO. 135:**

13 All documents relating to any submission, filing, or communication by or between  
14 Samsung and any of the Defined Wireless SSOs relating to Samsung’s licensing of any  
15 technology that is Essential or allegedly Essential to any Defined Wireless Standards, including  
16 without limitation licensing by Samsung on FRAND terms and any declarations made pursuant to  
17 the IPR policy of any of the Defined Wireless SSOs.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 135:**

19 In addition to its Objections and Responses Common to All Requests for Production,  
20 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
21 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
22 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
23 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
24 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
25 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
26 seeks. Samsung further objects to the Request as overly burdensome for its use of the overly  
27 broad terms “Defined Wireless SSOs” and “Defined Wireless Standards.” Samsung further  
28 objects to the Request to the extent it seeks documents that are not relevant to the claims or

1 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
2 evidence. Samsung further objects to the Request to the extent it seeks documents that are not  
3 within the possession, custody, or control of Samsung. Samsung further objects to the Request to  
4 the extent the requested documents are publicly available. Samsung further objects to the Request  
5 to the extent it seeks documents containing confidential third party information, including  
6 information subject to a non-disclosure or other agreement between Samsung and a third party.

7 Subject to these objections, Samsung will produce relevant, non-privileged documents  
8 within its possession, custody, or control, if any, after conducting a reasonable search in  
9 accordance with the Patent Local Rules.

10 **REQUEST FOR PRODUCTION NO. 136:**

11 Documents sufficient to identify Samsung's membership or participation in any of the  
12 Defined Wireless SSOs that have developed any of the Defined Wireless Standards, the dates of  
13 any such participation, and the names and titles of individuals representing or affiliated with  
14 Samsung in connection with such participation.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 136:**

16 In addition to its Objections and Responses Common to All Requests for Production,  
17 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
18 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
19 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
20 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
21 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
22 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
23 seeks. Samsung further objects to the Request as overly burdensome for its use of the overly  
24 broad terms "Defined Wireless SSOs" and "Defined Wireless Standards." Samsung further  
25 objects to the Request to the extent it seeks documents that are not relevant to the claims or  
26 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible  
27 evidence. Samsung further objects to the Request to the extent the requested documents are  
28 publicly available.

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 137:**

5 All documents relating to technical proposals, responses to others' technical proposals,  
6 reports, change requests, responses to others' change requests, emails or other communications,  
7 related to any Samsung technology, that were submitted or sent by Samsung to a working group or  
8 body operating under the auspices of any of the Defined Wireless SSOs, or were received by or  
9 sent to Samsung by a participant in such a Defined Wireless SSO working group or body.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 137:**

11 In addition to its Objections and Responses Common to All Requests for Production,  
12 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
13 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
14 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
15 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
16 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
17 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
18 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
19 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
20 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
21 objects to the Request as vague, ambiguous, and overly burdensome for its use of the terms "any  
22 Samsung technology," "body operating under the auspices of any of the Defined Wireless SSOs"  
23 and "Defined Wireless SSOs" Samsung further objects to the Request to the extent it seeks  
24 documents that are not within the possession, custody, or control of Samsung. Samsung further  
25 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
26 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
27 are publicly available. Samsung further objects to the Request to the extent it seeks documents  
28

1 containing confidential third party information, including information subject to a non-disclosure  
2 or other agreement between Samsung and a third party.

3 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
4 relevance and scope of the information sought by this request.

5 **REQUEST FOR PRODUCTION NO. 138:**

6 All documents relating to the evaluation, adoption, or incorporation by a Defined Wireless  
7 SSO of any of Samsung's Alleged Essential Technology into any of the Defined Wireless  
8 Standards.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 138:**

10 In addition to its Objections and Responses Common to All Requests for Production,  
11 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
12 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
13 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
14 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
15 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
16 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
17 seeks. Samsung further objects to the Request to the extent it seeks documents that are not  
18 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
19 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome  
20 for its use of the overly broad terms "Defined Wireless SSO," "Samsung's Alleged Essential  
21 Technology," and "Defined Wireless Standards." Samsung further objects to the Request to the  
22 extent it seeks documents that are not within the possession, custody, or control of Samsung.  
23 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
24 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
25 requested documents are publicly available.

26 Subject to these objections, Samsung will produce relevant, non-privileged documents  
27 within its possession, custody, or control, if any, after conducting a reasonable search in  
28 accordance with the Patent Local Rules.

1 **REQUEST FOR PRODUCTION NO. 139:**

2 All documents relating to evaluating, analyzing, or discussing actual or potential  
3 alternatives to technologies that Samsung has proposed for inclusion in any of the Defined  
4 Wireless Standards.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 139:**

6 In addition to its Objections and Responses Common to All Requests for Production,  
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
11 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
12 as vague and ambiguous. For example, the term “actual or potential alternatives” is vague and  
13 ambiguous. Samsung further objects to the Request as overbroad in that it is not reasonably  
14 limited as to the scope of documents and things it seeks. Samsung further objects to the Request  
15 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
16 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
17 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined  
18 Wireless Standards.” Samsung further objects to the Request as premature to the extent it seeks  
19 documents and things inconsistent with the timeframes set forth in the Northern District of  
20 California Patent Local Rules. Samsung further objects to the Request to the extent it calls for a  
21 legal conclusion.

22 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
23 relevance and scope of the information sought by this request.

24 **REQUEST FOR PRODUCTION NO. 140:**

25 Documents sufficient to show any incentives, awards, bonuses, compensation, or special  
26 payments provided by Samsung to inventors, including without limitation inventors of the  
27 Samsung Patents-In-Suit, or anyone acting on Samsung’s behalf, in consideration of filing patents  
28 or patent applications that may be or are declared essential to a Defined Wireless Standard.



1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 140:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
9 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
10 as overly burdensome for its use of the overly broad definition of “Defined Wireless Standards.”  
11 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
12 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
13 admissible evidence.

14 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
15 relevance and scope of the information sought by this request.

16 **REQUEST FOR PRODUCTION NO. 141:**

17 Documents sufficient to show any incentives, awards, bonuses, compensation, or special  
18 payments provided by Samsung to employees or anyone acting on Samsung’s behalf in  
19 consideration for having Samsung IPR proposed for adoption or adopted as part of a Defined  
20 Wireless Standard.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 141:**

22 In addition to its Objections and Responses Common to All Requests for Production,  
23 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
24 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
25 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
26 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
27 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
28 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it

1 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
2 reasonable time period and seeks documents and things from time periods not at issue in this  
3 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly  
4 broad definition of “Defined Wireless Standards.” Samsung further objects to the Request to the  
5 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not  
6 reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 142:**

10 All documents relating to Samsung’s identification, disclosure, or notification to any of the  
11 Defined Wireless SSOs of any of Samsung’s technology as Essential or allegedly Essential to any  
12 of the Defined Wireless Standards.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 142:**

14 In addition to its Objections and Responses Common to All Requests for Production,  
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
19 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
20 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
21 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
22 reasonable time period and seeks documents and things from time periods not at issue in this  
23 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly  
24 broad terms “Defined Wireless SSOs,” “Samsung’s Alleged Essential Technology,” and “Defined  
25 Wireless Standards.” Samsung further objects to the Request to the extent it seeks documents that  
26 are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead to  
27 the discovery of admissible evidence.

28

1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 143:**

5 All documents relating to any technology that was submitted to or considered by a Defined  
6 Wireless SSO as an actual or potential alternative to Samsung's Alleged Essential Technology in  
7 any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 143:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
15 Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
16 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
17 further objects to the Request as overly burdensome for its use of the overly broad terms "Defined  
18 Wireless SSO," "Samsung's Alleged Essential Technology," and "Defined Wireless Standards."  
19 Samsung further objects the Request as vague and ambiguous. For example, the term "actual or  
20 potential alternatives" is vague and ambiguous. Samsung further objects to the Request to the  
21 extent it seeks documents that are not within the possession, custody, or control of Samsung.  
22 Samsung further objects to the Request to the extent it seeks documents equally or more readily  
23 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
24 requested documents are publicly available. Samsung further objects to the Request as premature  
25 to the extent it seeks documents and things inconsistent with the timeframes set forth in the  
26 Northern District of California Patent Local Rules. Samsung further objects to the Request to the  
27 extent it calls for a legal conclusion.

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1 Subject to these objections, Samsung will produce relevant, non-privileged documents  
2 within its possession, custody, or control, if any, after conducting a reasonable search in  
3 accordance with the Patent Local Rules.

4 **REQUEST FOR PRODUCTION NO. 144:**

5 All documents relating to Samsung’s understanding of, and compliance with, any IPR  
6 practice, policy, or procedure of any of the Defined Wireless SSOs to disclose Essential IPR  
7 during the standardization process of any of the Defined Wireless Standards.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 144:**

9 In addition to its Objections and Responses Common to All Requests for Production,  
10 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
11 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
12 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
13 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
14 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
15 as vague and ambiguous. For example, the term “Samsung’s understanding of, and compliance  
16 with,” is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is  
17 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects  
18 to the Request as overbroad in that it is not limited to any reasonable time period and seeks  
19 documents and things from time periods not at issue in this litigation. Samsung further objects to  
20 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
21 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
22 further objects to the Request as overly burdensome for its use of the overly broad terms “Defined  
23 Wireless SSOs” and “Essential IPR” and “Defined Wireless Standards.”

24 Subject to these objections, Samsung will produce relevant, non-privileged documents  
25 within its possession, custody, or control, if any, after conducting a reasonable search in  
26 accordance with the Patent Local Rules.

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28

1 **REQUEST FOR PRODUCTION NO. 145:**

2 All documents relating to any decision by Samsung to disclose or not to disclose the  
3 existence of allegedly Essential IPR during the standardization process for any Defined Wireless  
4 Standard, including but not limited to, Samsung’s decision to disclose or not to disclose foreign  
5 patents and U.S. and foreign patent applications related to the Samsung Patents-In-Suit during the  
6 standardization process for any Defined Wireless Standard.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 145:**

8 In addition to its Objections and Responses Common to All Requests for Production,  
9 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
10 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
11 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
12 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
13 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
14 as vague and ambiguous. For example, the term “Samsung’s understanding of, and compliance  
15 with,” is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is  
16 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects  
17 to the Request as overbroad in that it is not limited to any reasonable time period and seeks  
18 documents and things from time periods not at issue in this litigation. Samsung further objects to  
19 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
20 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
21 further objects to the Request as overly burdensome for its use of the overly broad definition of  
22 “Defined Wireless Standards.” Samsung further objects to the Request as duplicative of Apple’s  
23 Request For Production Nos. 146 and 147.

24 Subject to these objections, Samsung will produce relevant, non-privileged documents  
25 within its possession, custody, or control, if any, after conducting a reasonable search in  
26 accordance with the Patent Local Rules.

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28

1 **REQUEST FOR PRODUCTION NO. 146:**

2 All documents relating to or comprising communications, statements, submissions, or  
3 presentations by Samsung regarding the IPR disclosure practices, policies, or procedures of any of  
4 the Defined Wireless SSOs.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 146:**

6 In addition to its Objections and Responses Common to All Requests for Production,  
7 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
8 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
9 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
10 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
11 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
12 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
13 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
14 reasonable time period and seeks documents and things from time periods not at issue in this  
15 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
16 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
17 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome  
18 for its use of the overly broad term “Defined Wireless SSOs.” Samsung further objects to the  
19 Request as duplicative of Apple’s Request For Production Nos. 145 and 147.

20 Subject to these objections, Samsung will produce relevant, non-privileged documents  
21 within its possession, custody, or control, if any, after conducting a reasonable search in  
22 accordance with the Patent Local Rules.

23 **REQUEST FOR PRODUCTION NO. 147:**

24 All documents relating to or comprising any Samsung policy, guidelines, or internal  
25 directives regarding Samsung’s understanding or interpretation of and/or compliance with any IPR  
26 disclosure practices, policies, or procedures of any of the Defined Wireless SSOs.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 147:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
8 as vague and ambiguous. For example, the term “Samsung’s understanding of, and compliance  
9 with,” is vague and ambiguous. Samsung further objects to the Request as overbroad in that it is  
10 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects  
11 to the Request as overbroad in that it is not limited to any reasonable time period and seeks  
12 documents and things from time periods not at issue in this litigation. Samsung further objects to  
13 the Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
14 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
15 further objects to the Request as overly burdensome for its use of the overly broad term “Defined  
16 Wireless SSOs.” Samsung further objects to the Request as duplicative of Apple’s Request For  
17 Production No. 145 and 146.

18 Subject to these objections, Samsung will produce relevant, non-privileged documents  
19 within its possession, custody, or control, if any, after conducting a reasonable search in  
20 accordance with the Patent Local Rules.

21 **REQUEST FOR PRODUCTION NO. 148:**

22 All documents relating to or comprising communications, statements, submissions, or  
23 presentations by Samsung regarding caps or other limits on cumulative royalties for IPR Essential  
24 to any Defined Wireless Standards, the determination of a FRAND royalty rate, and/or the effect  
25 of standardization on monopoly power in the licensing of IPR Essential to any Defined Wireless  
26 Standards.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 148:**

2 In addition to its Objections and Responses Common to All Requests for Production,  
3 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
4 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
5 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
6 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
7 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
8 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
9 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
10 reasonable time period and seeks documents and things from time periods not at issue in this  
11 litigation. Samsung further objects to the Request as overly burdensome for its use of the overly  
12 broad terms “Defined Wireless Standards” and “IPR Essential to any Defined Wireless  
13 Standards.” Samsung further objects to the Request to the extent it seeks documents that are not  
14 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
15 discovery of admissible evidence.

16 Subject to these objections, Samsung will produce relevant, non-privileged documents  
17 within its possession, custody, or control, if any, after conducting a reasonable search in  
18 accordance with the Patent Local Rules.

19 **REQUEST FOR PRODUCTION NO. 149:**

20 All documents relating to actual or potential competition between Samsung and any person  
21 or company that designs or sells Mobile Wireless Telecommunications Devices complying,  
22 conforming with, or using any of the Defined Wireless Standards. This request includes, but is not  
23 limited to:

24 (a) documents relating to actual or potential market shares of Mobile Wireless  
25 Telecommunications Devices;

26 (b) documents relating to the competitive position or relative strengths and weaknesses  
27 of Samsung’s Mobile Wireless Telecommunications Devices and/or any other competing Mobile  
28 Wireless Telecommunications Devices;



1 (c) documents relating to product and/or technology comparisons between Samsung  
2 and any of its actual or potential competitors offering Mobile Wireless Telecommunications  
3 Devices;

4 (d) documents relating to or comprising actual or projected numbers of customers or  
5 revenues from the sale of Mobile Wireless Telecommunications Devices by Samsung or any of its  
6 actual or potential competitors;

7 (e) documents relating to or comprising an analysis of actual or potential competition  
8 for improvements or innovations in features, functions, ease of operation, performance, cost, or  
9 other advantages to customers or users of Mobile Wireless Telecommunications Devices; and

10 (f) documents relating to or comprising policies and strategies for responding to new  
11 entrants in the sale of Mobile Wireless Telecommunications Devices, including mobile wireless  
12 handsets complying, conforming with, or using any of the Defined Wireless Standards.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 149:**

14 In addition to its Objections and Responses Common to All Requests for Production,  
15 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
16 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
17 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
18 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
19 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
20 as vague and ambiguous. For example, the term “actual or potential competition between  
21 Samsung and any person or company” is vague and ambiguous. Samsung further objects to the  
22 Request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
23 seeks. Samsung further objects to the Request as overbroad in that it is not limited to any  
24 reasonable time period and seeks documents and things from time periods not at issue in this  
25 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
26 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
27 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome  
28 for its use of the overly broad definition of “Defined Wireless Standards.” Samsung further

1 objects to the Request to the extent it seeks documents that are not within the possession, custody,  
2 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents  
3 equally or more readily available to Apple than to Samsung. Samsung further objects to the  
4 Request to the extent the requested documents are publicly available. Samsung further objects to  
5 the Request to the extent it seeks documents containing confidential third party information,  
6 including information subject to a non-disclosure or other agreement between Samsung and a third  
7 party.

8 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
9 relevance and scope of the information sought by this request.

10 **REQUEST FOR PRODUCTION NO. 150:**

11 All documents relating to actual or potential competition between Samsung and Apple.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 150:**

13 In addition to its Objections and Responses Common to All Requests for Production,  
14 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
15 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
16 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
17 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
18 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
19 as vague and ambiguous. For example, the term “actual or potential competition” is vague and  
20 ambiguous. Samsung further objects to the Request as overbroad in that it seeks documents and  
21 things that pertain to products not at issue in this litigation. Samsung further objects to the  
22 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
23 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
24 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
25 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
26 objects to the Request to the extent it seeks documents that are not within the possession, custody,  
27 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents  
28 equally or more readily available to Apple than to Samsung. Samsung further objects to the

1 Request to the extent the requested documents are publicly available. Samsung further objects to  
2 the Request to the extent it seeks documents containing confidential third party information,  
3 including information subject to a non-disclosure or other agreement between Samsung and a third  
4 party.

5 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
6 relevance and scope of the information sought by this request.

7 **REQUEST FOR PRODUCTION NO. 151:**

8 All documents relating to actual or potential litigation or arbitration threatened or filed by  
9 or against Samsung, including but not limited to *In re Certain 3G WCDMA Handsets (InterDigital*  
10 *v. Samsung)*, No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson*  
11 *v. Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re*  
12 *Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct. San  
13 Francisco), regarding the licensing of any IPR related to the Defined Wireless Standards,  
14 including without limitation any and all expert reports and court filings, and transcripts of any  
15 deposition, hearing, or other recorded or transcribed proceeding in the arbitrations or litigations.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 151:**

17 In addition to its Objections and Responses Common to All Requests for Production,  
18 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
19 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
20 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
21 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
22 burdensome, and/or would require undue expense to answer. Samsung further objects the Request  
23 as vague and ambiguous. For example, the term “potential litigation or arbitration” is vague and  
24 ambiguous. Samsung further objects to the Request as overbroad in that it is not limited to any  
25 reasonable time period and seeks documents and things from time periods not at issue in this  
26 litigation. Samsung further objects to the Request to the extent it seeks documents that are not  
27 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
28 discovery of admissible evidence. Samsung further objects to the Request as overly burdensome

1 for its use of the overly broad definition of “Defined Wireless Standards.” Samsung further  
2 objects to the Request to the extent it seeks documents that are not within the possession, custody,  
3 or control of Samsung. Samsung further objects to the Request to the extent it seeks documents  
4 equally or more readily available to Apple than to Samsung. Samsung further objects to the  
5 Request to the extent the requested documents are publicly available. Samsung further objects to  
6 the Request to the extent it seeks documents subject to a protective order or under seal.

7 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
8 relevance and scope of the information sought by this request.

9 **REQUEST FOR PRODUCTION NO. 152:**

10 All documents relating to or containing any claims or statements by Samsung in any  
11 litigation or judicial proceeding, including but not limited to *In re Certain 3G WCDMA Handsets*  
12 (*InterDigital v. Samsung*), No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D.  
13 Del.); *Ericsson v. Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D.  
14 Cal.); *In re Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct.  
15 San Francisco), regarding the licensing of IPR that is claimed Essential to any Defined Wireless  
16 Standard, the determination of a: FRAND royalty rate for any IPR that is claimed Essential to any  
17 Defined Wireless Standard, and the propriety of injunctive relief for the infringement of IPR  
18 claimed to be Essential to any Defined Wireless Standard.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 152:**

20 In addition to its Objections and Responses Common to All Requests for Production,  
21 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
22 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
23 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
24 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
25 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
26 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
27 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
28 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or

1 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
2 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined  
3 Wireless Standards.” Samsung further objects to the Request to the extent it seeks documents that  
4 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
5 Request to the extent it seeks documents equally or more readily available to Apple than to  
6 Samsung. Samsung further objects to the Request to the extent the requested documents are  
7 publicly available. Samsung further objects to the Request to the extent it seeks documents  
8 subject to a protective order or under seal.

9 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
10 relevance and scope of the information sought by this request.

11 **REQUEST FOR PRODUCTION NO. 153:**

12 All transcripts of depositions or other documents containing any testimony and or  
13 statements by Samsung, former Samsung affiliates or employees, or experts retained by Samsung  
14 or counsel to Samsung, relating to any litigation or judicial proceeding, including but not limited  
15 to *In re Certain 3G WCDMA Handsets (InterDigital v. Samsung)*, No. 337-TA-601 (I.T.C.);  
16 *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson v. Samsung*, No. 06-0063 (E.D. Tex.);  
17 *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re Rambus*, No. 9302 (F.T.C.); and *Rambus v.*  
18 *Micron*, No. 04-431105 (Cal. Super. Ct. San Francisco), concerning IPR claimed Essential to any  
19 Defined Wireless Standard, the determination of a FRAND royalty rate for any IPR allegedly  
20 Essential to a Defined Wireless Standard, and the propriety of injunctive relief for the  
21 infringement of IPR claimed to be Essential to any Defined Wireless Standard.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 153:**

23 In addition to its Objections and Responses Common to All Requests for Production,  
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
28 burdensome, and/or would require undue expense to answer. Samsung further objects to the

1 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
2 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
3 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
4 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
5 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined  
6 Wireless Standards.” Samsung further objects to the Request as duplicative of Apple’s Request  
7 For Production No. 152. Samsung further objects to the Request to the extent it seeks documents  
8 that are not within the possession, custody, or control of Samsung. Samsung further objects to the  
9 Request to the extent it seeks documents equally or more readily available to Apple than to  
10 Samsung. Samsung further objects to the Request to the extent the requested documents are  
11 publicly available. Samsung further objects to the Request to the extent it seeks documents  
12 subject to a protective order or under seal.

13 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
14 relevance and scope of the information sought by this request.

15 **REQUEST FOR PRODUCTION NO. 154:**

16 All documents prepared by any expert, including any technical, economic, marketing or  
17 licensing experts, retained by Samsung or by counsel to Samsung for any litigation or judicial  
18 proceeding, including but not limited to *In re Certain 3G WCDMA Handsets (InterDigital v.*  
19 *Samsung)*, No. 337-TA-601 (I.T.C.); *Samsung v. InterDigital*, No. 07-0167 (D. Del.); *Ericsson v.*  
20 *Samsung*, No. 06-0063 (E.D. Tex.); *Rambus v. Hynix et al.*, No. 05-0334 (N.D. Cal.); *In re*  
21 *Rambus*, No. 9302 (F.T.C.); and *Rambus v. Micron*, No. 04-431105 (Cal. Super. Ct. San  
22 Francisco), concerning IPR claimed Essential to any Defined Wireless Standard, the determination  
23 of a FRAND royalty rate for any IPR allegedly Essential to a Defined Wireless Standard, and the  
24 propriety of injunctive relief for the infringement of IPR claimed to be Essential to any Defined  
25 Wireless Standard.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 154:**

27 In addition to its Objections and Responses Common to All Requests for Production,  
28 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it

1 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
2 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
3 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
4 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
5 Request as overbroad in that it is not limited to any reasonable time period and seeks documents  
6 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
7 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
8 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
9 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined  
10 Wireless Standards.” Samsung further objects to the Request as duplicative of Apple’s Request  
11 For Production Nos. 152 and 153. Samsung further objects to the Request to the extent it seeks  
12 documents that are not within the possession, custody, or control of Samsung. Samsung further  
13 objects to the Request to the extent it seeks documents equally or more readily available to Apple  
14 than to Samsung. Samsung further objects to the Request to the extent the requested documents  
15 are publicly available. Samsung further objects to the Request to the extent it seeks documents  
16 subject to a protective order or under seal.

17           Subject to these objections, Samsung is willing to meet and confer with Apple about the  
18 relevance and scope of the information sought by this request.

19 **REQUEST FOR PRODUCTION NO. 155:**

20           All documents relating to any Samsung policy or practice for compliance with any federal  
21 or state antitrust, unfair competition, or unfair trade practices law.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 155:**

23           In addition to its Objections and Responses Common to All Requests for Production,  
24 which it hereby incorporates by reference, Samsung objects to this Request to the extent that it  
25 seeks to elicit information subject to and protected by the attorney-client privilege, the attorney  
26 work-product doctrine, the joint defense privilege, the common interest doctrine, and/or any other  
27 applicable privilege or immunity. Samsung further objects to the Request to the extent it is unduly  
28 burdensome, and/or would require undue expense to answer. Samsung further objects the Request

1 as vague and ambiguous. For example, the term “compliance” is vague and ambiguous. Samsung  
2 further objects to the Request as overbroad in that it seeks documents and things that pertain to  
3 products not at issue in this litigation. Samsung further objects to the Request as overbroad in that  
4 it seeks documents and things that bear on occurrences in other countries that are not at issue in  
5 this litigation. Samsung further objects to the Request as overbroad in that it is not limited to any  
6 reasonable time period and seeks documents and things from time periods not at issue in this  
7 litigation.

8 Subject to these objections, Samsung is willing to meet and confer with Apple about the  
9 relevance and scope of the information sought by this request.

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DATED: September 8, 2011

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria Maroulis

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Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC



1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on Sept. 8, 2011, I caused **SAMSUNG’S OBJECTIONS AND**  
3 **RESPONSES TO APPLE, INC.’S THIRD SET OF REQUESTS FOR PRODUCTION OF**  
4 **DOCUMENTS AND THINGS (NOS. 53-155)** to be electronically served on the following via  
5 email:

6 **ATTORNEYS FOR APPLE INC.**

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25

26 I declare under penalty of perjury that the foregoing is true and correct. Executed in

27 Redwood Shores, California on Sept. 8, 2011.

28

/s/ Melissa N. Chan