

# EXHIBIT 4

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LTD., SAMSUNG ELECTRONICS AMERICA,

20 INC. and SAMSUNG

21 TELECOMMUNICATIONS AMERICA, LLC

22

23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

25

26 APPLE INC., a California corporation,

27 Plaintiff,

28 vs.

29 SAMSUNG ELECTRONICS CO., LTD., a

30 Korean business entity; SAMSUNG

31 ELECTRONICS AMERICA, INC., a New

32 York corporation; SAMSUNG

33 TELECOMMUNICATIONS AMERICA,

34 LLC, a Delaware limited liability company,

35

36 Defendant.

37

38

39

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S OBJECTIONS AND  
RESPONSES TO APPLE INC.'S FOURTH  
SET OF REQUESTS FOR PRODUCTION  
OF DOCUMENTS AND THINGS (NOS.  
156-187)**

1                                    **OBJECTIONS COMMON TO ALL REQUESTS FOR PRODUCTION**

2                    The following objections apply to each document request in Apple Inc.’s (“Apple’s”)  
3 Fourth Set of Requests for Production of Documents and Things, whether or not stated separately  
4 in response to each particular document request.

5                    1.        Samsung objects to each document request to the extent that it requests documents  
6 and information protected from disclosure by the attorney-client privilege, attorney work product  
7 doctrine, community of interest doctrine, joint defense privilege, and/or any other applicable  
8 privilege. Any such documents and information will not be provided, and an inadvertent  
9 production of any document or information that Samsung believes is immune from discovery  
10 pursuant to any applicable privilege shall not be deemed a waiver. Samsung may give written  
11 notice to Apple that the document or information inadvertently produced is privileged or otherwise  
12 protected, and upon receipt of such written notice, Apple shall immediately comply with Federal  
13 Rule of Civil Procedure 26(b)(5)(B) and the applicable provisions of any Protective Order entered  
14 in this action, including the Model Interim Protective Order.

15                    2.        Samsung objects to each document request to the extent that it is vague,  
16 ambiguous, overly broad, oppressive, unduly burdensome, harassing, compound, fails to identify  
17 the documents and things sought with reasonable particularity, and seeks information that is  
18 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Where  
19 a term is vague and ambiguous, Samsung will respond based on its understanding of the term.

20                    3.        Samsung objects to each document request to the extent that it is not reasonably  
21 limited in time or geographic scope, and to the extent it pertains to technology that are is at issue  
22 in this litigation.

23                    4.        Samsung objects to each document request to the extent that it seeks documents  
24 that are not within its possession, custody or control. In making objections and/or responding to  
25 any and all requests, Samsung does not indicate that responsive documents exist within the  
26 ownership, possession, custody or control of Samsung.

27                    5.        Samsung objects to the definition of “Samsung,” “You,” “Your,” and  
28 “Defendants” as overly broad, unduly burdensome, vague, and as calling for documents or

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

12 8. Samsung objects to the definition of "Relating" as overly broad.

13 9. Samsung objects to Instruction Nos. 1 and 3 to the extent they ask for documents to  
14 be produced "in their entirety." Where applicable, Samsung will redact from certain documents  
15 any non-responsive, irrelevant or privileged information.

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

21 11. Samsung objects to each document request to the extent it seeks documents more  
22 readily available to Apple than to Samsung, or equally available to Apple as to Samsung,  
23 including documents and things that are publicly available.

24 12. Samsung objects to each document request to the extent that it seeks the  
25 confidential, proprietary and/or trade secret information of third parties, and to the extent it seeks  
26 information subject to non-disclosure or other agreements between Samsung and third parties.

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

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

4           15. Samsung objects to each document request to the extent that it seeks a legal  
5 conclusion.

6           16. Samsung objects to each document request to the extent that it seeks to impose any  
7 requirement or discovery obligation greater or different than those imposed by the Federal Rules  
8 of Civil Procedure.

9           17. Samsung's investigation and analysis of the facts and law pertaining to this lawsuit  
10 is ongoing. Thus, Samsung's responses are made without prejudice to its right to subsequently  
11 add, modify or otherwise change, correct, or amend these responses.

12

13

**SPECIFIC OBJECTIONS AND RESPONSES**

14

**REQUEST NO. 156**

15

All documents and communications with an expert witness who is expected to testify in  
16 this Litigation that (i) relate to compensation for the expert's work or testimony; (ii) identify facts  
17 or data that Samsung's attorneys provided and that the expert considered in forming any opinions  
18 to be expressed; and (iii) identify assumptions that Samsung's attorneys provided and the expert  
19 relied on in forming any opinions to be expressed.

20

**OBJECTIONS AND RESPONSE TO REQUEST NO. 156:**

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 further objects to the Request to the extent it is unduly  
26 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
27 request as vague and ambiguous. For example, the term "assumptions" is vague and ambiguous.  
28 Samsung further objects to the request as overbroad because it calls for "all" documents. Samsung

1 further objects to the Request to the extent it seeks documents that are not within the possession,  
2 custody, or control of Samsung. Samsung further objects to the Request as premature to the extent  
3 it seeks documents and things inconsistent with the applicable timeframes, such as those set forth  
4 in the Northern District of California Patent Local Rules and any applicable scheduling order.  
5 Samsung further objects to the Request to the extent it calls for a legal conclusion.

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 NO. 157**

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

13 **OBJECTIONS AND RESPONSE TO REQUEST NO. 157:**

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 because it calls for “all” documents.  
22 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
23 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
24 admissible evidence. Samsung further objects to the Request to the extent it seeks documents that  
25 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
26 request to the extent it seeks documents equally or more readily available to Apple than to  
27 Samsung. Samsung further objects to the Request to the extent the requested documents are  
28 publicly available. Samsung further objects to the Request as premature to the extent it seeks

1 documents and things inconsistent with the applicable timeframes, such as those set forth in the  
2 Northern District of California Patent Local Rules and any applicable scheduling order. Samsung  
3 further objects to the Request to the extent it calls for a legal conclusion.

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 NO. 158**

7 All documents relating to the *Georgia Pacific* factors as those factors relate to Samsung's  
8 claim for damages arising from Apple's alleged infringement of the Samsung Patents-In-Suit.

9 **OBJECTIONS AND RESPONSE TO REQUEST NO. 158:**

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 vague and ambiguous. For example, the term "Georgia Pacific factors" is vague and  
17 ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
18 as to the scope of documents and things it seeks. Samsung further objects to the request as  
19 overbroad because it calls for "all" documents. Samsung further objects to the Request as  
20 premature to the extent it seeks documents and things inconsistent with the applicable timeframes,  
21 such as those set forth in the Northern District of California Patent Local Rules and any applicable  
22 scheduling order. Samsung further objects to the Request to the extent it calls for a legal  
23 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 NO. 159**

27 All documents and things relating to accolades and awards given to products that embody  
28 any alleged invention claimed by the Samsung Patents-In-Suit.

1 **OBJECTIONS AND RESPONSE TO REQUEST NO. 159:**

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 vague and ambiguous. For example, the term “accolade” is vague and ambiguous.  
9 Samsung further objects to the request as overbroad in that it is not reasonably limited as to the  
10 scope of documents and things it seeks. Samsung further objects to the request as overbroad  
11 because it calls for “all” documents. 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.

16 Subject to and without waiving the foregoing objections, and without representing that any  
17 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
18 things in its possession, custody and control discovered as a result of a reasonably diligent search.

19 **REQUEST NO. 160**

20 All documents and things evidencing Samsung’s licensing program, including without  
21 limitation documents sufficient to identify all licensing personnel, location of said personnel, and  
22 duties of said personnel.

23 **OBJECTIONS AND RESPONSE TO REQUEST NO. 160:**

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 as vague and ambiguous. For example, the term “licensing program” is vague and  
3 ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
4 as to the scope of documents and things it seeks. 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 as  
7 overbroad because it calls for “all” documents. Samsung further objects to the Request to the  
8 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not  
9 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to  
10 the Request to the extent it seeks documents that are not within the possession, custody, or control  
11 of Samsung. Samsung further objects to the Request to the extent it seeks documents containing  
12 confidential third party information, including information subject to a non-disclosure or other  
13 agreement between Samsung and a third party, or a protective order.

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 NO. 161**

17           All documents and things relating to Samsung’s attempts to license to others the Samsung  
18 Patents-In-Suit and any related patents which have not yet resulted in a license agreement,  
19 including without limitation cease and desist letters, draft agreements, and other communications.

20 **OBJECTIONS AND RESPONSE TO REQUEST NO. 161:**

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 further objects to the Request to the extent it is unduly  
26 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
27 request as vague and ambiguous. For example, the term “any related patents” is vague and  
28 ambiguous. Samsung further objects to the request as overbroad because it calls for “all”

1 documents. Samsung further objects to the Request to the extent it seeks documents that are not  
2 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
3 discovery of admissible evidence. Samsung further objects to the Request as duplicative of  
4 Apple's Request No. 161.

5 Subject to and without waiving the foregoing objections, and without representing that any  
6 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
7 things in its possession, custody and control discovered as a result of a reasonably diligent search.

8 **REQUEST NO. 162**

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

11 **OBJECTIONS AND RESPONSE TO REQUEST NO. 162:**

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 vague and ambiguous. For example, the terms "attempt to enforce" and "any related  
19 patents" are vague and ambiguous. Samsung further objects to the request as overbroad in that it  
20 is not reasonably limited as to the scope of documents and things it seeks. 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 the requested documents are  
24 publicly available.

25 Subject to and without waiving the foregoing objections, and without representing that any  
26 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
27 things in its possession, custody and control discovered as a result of a reasonably diligent search.

28

1 **REQUEST NO. 163**

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

4 **OBJECTIONS AND RESPONSE TO REQUEST NO. 163:**

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 as vague and ambiguous. For example, the term “made available” is vague and  
12 ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
13 as to the scope of documents and things it seeks. Samsung further objects to the request as  
14 overbroad because it calls for “all” documents. Samsung further objects to the Request to the  
15 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not  
16 reasonably calculated to lead to the discovery of admissible evidence. Samsung further objects to  
17 the Request to the extent it is duplicative of others of Apple’s Requests For Production. Samsung  
18 further objects to the Request to the extent it seeks documents that are not within the possession,  
19 custody, or control of Samsung. Samsung further objects to the request to the extent it seeks  
20 documents equally or more readily available to Apple than to Samsung. Samsung further objects  
21 to the Request to the extent the requested documents are publicly available.

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 NO. 164**

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

27  
28

1 **OBJECTIONS AND RESPONSE TO REQUEST NO. 164:**

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 vague and ambiguous. For example, the terms “any related patents” and “security  
9 interest” are vague and ambiguous. Samsung further objects to the request as overbroad in that it  
10 is not reasonably limited as to the scope of documents and things it seeks. Samsung further  
11 objects to the request as overbroad because it calls for “all” documents. Samsung further objects  
12 to the Request to the extent it seeks documents that are not relevant to the claims or defenses of  
13 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.  
14 Samsung further objects to the Request to 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 NO. 165**

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

20 **OBJECTIONS AND RESPONSE TO REQUEST NO. 165:**

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 further objects to the Request to the extent it is unduly  
26 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
27 request as vague and ambiguous. For example, the term “any related patents” is vague and  
28 ambiguous. Samsung further objects to the request as overbroad because it calls for “all”

1 documents. Samsung further objects to the Request as duplicative of Apple’s Request For  
2 Production No. 93. Samsung further objects to the Request to the extent it calls for a legal  
3 conclusion.

4 Subject to and without waiving the foregoing objections, and without representing that any  
5 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
6 things in its possession, custody and control, discovered as a result of a reasonably diligent search.

7 **REQUEST NO. 166**

8 All documents relating to Samsung’s decision to mark or not to mark any product with the  
9 numbers of any of the Samsung Patents-In-Suit.

10 **OBJECTIONS AND RESPONSE TO REQUEST NO. 166:**

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 vague and ambiguous. For example, the term “decision to mark or not to mark” is  
18 vague and ambiguous. Samsung further objects to the request as overbroad in that it is not  
19 reasonably limited as to the scope of documents and things it seeks. Samsung further objects to  
20 the request as overbroad in that it is not limited to any reasonable time period and seeks  
21 documents and things from time periods not at issue in this litigation. Samsung further objects to  
22 the request as overbroad because it calls for “all” documents. Samsung further objects to the  
23 Request to the extent it seeks documents that are not relevant to the claims or defenses of any  
24 party and/or not reasonably calculated to lead to the discovery of admissible evidence. Samsung  
25 further objects to the Request as duplicative of Apple's Requests Nos. 167 and 168.

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

28

1 **REQUEST NO. 167**

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

4 **OBJECTIONS AND RESPONSE TO REQUEST NO. 167:**

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 as overbroad in that it is not reasonably limited as to the scope of documents and things it  
12 seeks. Samsung further objects to the request as overbroad because it calls for “all” documents.  
13 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
14 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
15 admissible evidence. Samsung further objects to the Request as duplicative of Apple’s Requests  
16 Nos. 166 and 168.

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 NO. 168**

20 All documents and things evidencing Samsung’s or any licensee’s or any third party’s  
21 marking of any product with the numbers of any of the Samsung Patents-in-Suit.

22 **OBJECTIONS AND RESPONSE TO REQUEST NO. 168:**

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 reasonably limited as to the scope of documents and things it  
2 seeks. Samsung further objects to the request as overbroad because it calls for “all” documents.  
3 Samsung further objects to the Request as duplicative of Apple’s Requests Nos. 166 and 167.  
4 Samsung further objects to the Request to the extent it seeks documents that are not within the  
5 possession, custody, or control of Samsung. Samsung further objects to the request to the extent it  
6 seeks documents equally or more readily available to Apple than to Samsung. Samsung further  
7 objects to the Request to the extent the requested documents are publicly available.

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 NO. 169**

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

14 **OBJECTIONS AND RESPONSE TO REQUEST NO. 169:**

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 vague and ambiguous. Samsung further objects to the request as overbroad in that it is  
22 not reasonably limited as to the scope of documents and things it seeks. Samsung further objects  
23 to the request as overbroad because it calls for “all” documents. Samsung further objects to the  
24 Request as premature to the extent it seeks documents and things inconsistent with the applicable  
25 timeframes, such as those set forth in the Northern District of California Patent Local Rules and  
26 any applicable scheduling order. Samsung further objects to the Request to the extent it calls for a  
27 legal conclusion.

28

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 NO. 170**

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

6 **OBJECTIONS AND RESPONSE TO REQUEST NO. 170:**

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 as overbroad because it calls for “all” documents.  
15 Samsung further objects to the Request as premature to the extent it seeks documents and things  
16 inconsistent with the applicable timeframes, such as those set forth in the Northern District of  
17 California Patent Local Rules and any applicable scheduling order. Samsung further objects to the  
18 Request to the extent it calls for a legal conclusion.

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 NO. 171**

22 All documents relating to budgets, projected revenues and expenses, projected sales,  
23 projected profits, or other forecasts of operations concerning each Samsung Product you claim  
24 embodies any invention claimed in any claim of any of the Samsung Patents-In-Suit.

25 **OBJECTIONS AND RESPONSE TO REQUEST NO. 171:**

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 reasonably limited as to the scope of documents and things it  
5 seeks. Samsung further objects to the request as overbroad because it calls for “all” documents.  
6 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
7 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
8 admissible evidence.

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 NO. 172**

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

17 **OBJECTIONS AND RESPONSE TO REQUEST NO. 172:**

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 because it calls for “all” documents.  
26 Samsung further objects to the Request to the extent it seeks documents that are not relevant to the  
27 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of  
28 admissible 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 NO. 173**

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

9 **OBJECTIONS AND RESPONSE TO REQUEST NO. 173:**

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 as overbroad in that it is not limited to any  
18 reasonable time period and seeks documents and things from time periods not at issue in this  
19 litigation. Samsung further objects to the request as overbroad because it calls for "all"  
20 documents. Samsung further objects to the Request to the extent it seeks documents that are not  
21 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
22 discovery of admissible evidence.

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 NO. 174**

26 All documents that list, describe, detail, or concern the market for each Samsung Product  
27 you claim embodies any invention claimed in any claim of any of the Samsung Patents-In-Suit,  
28

1 including without limitation documents concerning: (a) actual, projected, or potential market size  
2 or market shares; and (b) industry trends or developments.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 174:**

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 vague and ambiguous. For example, the terms “market” and “industry trends” is vague  
11 and ambiguous. Samsung further objects to the request as overbroad because it calls for “all”  
12 documents.

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 NO. 175**

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

20 **OBJECTIONS AND RESPONSE TO REQUEST NO. 175:**

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 further objects to the Request to the extent it is unduly  
26 burdensome, and/or would require undue expense to answer. Samsung further objects to the  
27 request as vague and ambiguous. For example, the terms “multiplexing” and “segmentation” are  
28 vague and ambiguous. Samsung further objects to the request as overbroad in that it is not

1 reasonably limited as to the scope of documents and things it seeks. For instance, it is not limited  
2 to one specific standard. Samsung further objects to the request as overbroad because it calls for  
3 “all” documents. Samsung further objects to the Request to the extent it seeks documents that are  
4 not relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the  
5 discovery of admissible evidence. For instance, the Request refers to technology not included in  
6 the patents-in-suit. Samsung further objects to the Request to the extent it seeks documents that  
7 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
8 request to the extent it seeks documents equally or more readily available to Apple than to  
9 Samsung. Samsung further objects to the Request to the extent the requested documents are  
10 publicly available.

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

13 **REQUEST NO. 176**

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

- 20 (a) Samsung’s participation therein
- 21 (b) channel coding
- 22 (c) radio frame segmentation
- 23 (d) radio frame equalization
- 24 (e) transport channel multiplexing
- 25 (f) physical channel segmentation
- 26 (g) any draft or version of any specification ultimately standardized as TS  
27 25.212, and any follow-on draft or version of TS 25.212

28

1 (h) proposals and submissions to GSM/ETSI/3GPP regarding transport  
2 channel processing technology from any party, including without  
3 limitation Samsung

4 (i) selection of features and technologies for transport channel processing  
5 technology

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

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

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

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

16 **OBJECTIONS AND RESPONSE TO REQUEST NO. 176:**

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 to the  
23 request as overbroad in that it is not reasonably limited as to the scope of documents and things it  
24 seeks. For instance, it is not limited to one standard. Samsung further objects to the request as  
25 overbroad because it calls for "all" documents. Samsung further objects to the Request to the  
26 extent it seeks documents that are not relevant to the claims or defenses of any party and/or not  
27 reasonably calculated to lead to the discovery of admissible evidence. For instance, the Request  
28 relates to IPR not included in the patents-in-suit. Samsung further objects to the Request as  
duplicative of Apple's Request For Production No. 174. Samsung further objects to the Request  
to the extent it seeks documents that are not within the possession, custody, or control of Samsung.  
Samsung further objects to the request to the extent it seeks documents equally or more readily  
available to Apple than to Samsung. Samsung further objects to the Request to the extent the

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

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 NO. 177**

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

12 **OBJECTIONS AND RESPONSE TO REQUEST NO. 177:**

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 to the  
19 request as vague and ambiguous. For example, the term “transport channel” is vague and  
20 ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
21 as to the scope of documents and things it seeks. For instance, it is not limited to one standard.  
22 Samsung further objects to the request as overbroad because it calls for “all” documents. Samsung  
23 further objects to the Request as duplicative of Apple’s Request No. 174. Samsung further objects  
24 to the Request to the extent it seeks documents that are not within the possession, custody, or  
25 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 to the extent the requested documents are publicly available.

28

1 Subject to and without waiving the foregoing objections, and without representing that any  
2 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
3 things in its possession, custody and control discovered as a result of a reasonably diligent search.

4 **REQUEST NO. 178**

5 All documents concerning data packet construction, including but not limited to  
6 segmentation, concatenation, padding, length indicator optimization, pre-defined length indicator  
7 values, header extension bits, and RLC-SDU alignment that, prior to May 4, 2005, was known,  
8 patented, conceived, described, used, made, created, analyzed, tested, standardized, developed, or  
9 in development.

10 **OBJECTIONS AND RESPONSE TO REQUEST NO. 178:**

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 vague and ambiguous. For example, the terms “concatenation,” “header extension bits”  
18 and “padding” are 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. For instance, it is  
20 not limited to one standard. Samsung further objects to the request as overbroad because it calls  
21 for “all” documents. Samsung further objects to the Request to the extent it seeks documents that  
22 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
23 request to the extent it seeks documents equally or more readily available to Apple than to  
24 Samsung. Samsung further objects to the Request to the extent the requested documents are  
25 publicly available. Samsung further objects to the Request to the extent it seeks documents  
26 containing confidential third party information, including information subject to a non-disclosure  
27 or other agreement between Samsung and a third party, or a protective order.

28

1 Subject to and without waiving the foregoing objections, and without representing that any  
2 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
3 things in its possession, custody and control discovered as a result of a reasonably diligent search.

4 **REQUEST NO. 179**

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

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



1 for example discussion or analysis about what patents to declare essential  
2 (or not declare essential) and when.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 179:**

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. For instance, it is not limited to one specific standard. Samsung further objects to the  
12 request as overbroad because it calls for “all” documents. Samsung further objects to the Request  
13 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
14 not reasonably calculated to lead to the discovery of admissible evidence. For instance, the  
15 Request relates to IPR not included in the patents-in-suit. Samsung further objects to the Request  
16 as duplicative of Apple’s Request No. 178. Samsung further objects to the Request to the extent it  
17 seeks documents that are not within the possession, custody, or control of Samsung. Samsung  
18 further objects to the request to the extent it seeks documents equally or more readily available to  
19 Apple than to Samsung. Samsung further objects to the Request to the extent the requested  
20 documents are publicly available. Samsung further objects to the Request to the extent it seeks  
21 documents containing confidential third party information, including information subject to a non-  
22 disclosure or other agreement between Samsung and a third party, or a protective order.

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 NO. 180**

26 All documents, including without limitation documents constituting or concerning  
27 communications within Samsung, between Samsung and any third party, constituting or  
28 concerning data packet construction proposed, considered for proposal, conceived, created,

1 developed, tested, analyzed, or selected for inclusion in any telecommunication standard,  
2 including without limitation 3GPP TS 25.322 and 3GPP TS 25.306.

3 **OBJECTIONS AND RESPONSE TO REQUEST NO. 180:**

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 vague and ambiguous. For example, the term “data packet construction” is vague and  
11 ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
12 as to the scope of documents and things it seeks. Samsung further objects to the request as  
13 overbroad because it calls for “all” documents. Samsung further objects to the Request as  
14 duplicative of Apple’s Request No. 178. Samsung further objects to the Request to the extent it  
15 seeks documents that are not within the possession, custody, or control of Samsung. Samsung  
16 further objects to the request to the extent it seeks documents equally or more readily available to  
17 Apple than to Samsung. Samsung further objects to the Request to the extent the requested  
18 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 NO. 181**

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

26 **OBJECTIONS AND RESPONSE TO REQUEST NO. 181:**

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 vague and ambiguous. For example, following terms are vague and ambiguous:  
6 “enhanced uplink service,” “control of transmit power,” “transmit power factor,” and “power  
7 factor scaling.” Samsung further objects to the request as overbroad in that it is not reasonably  
8 limited as to the scope of documents and things it seeks. Samsung further objects to the request as  
9 overbroad because it calls for “all” documents. Samsung further objects to the Request to the  
10 extent it seeks documents that are not within the possession, custody, or control of Samsung.  
11 Samsung further objects to the request to the extent it seeks documents equally or more readily  
12 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
13 requested documents are publicly available. Samsung further objects to the Request to the extent  
14 it seeks documents containing confidential third party information, including information subject  
15 to a non-disclosure or other agreement between Samsung and a third party, or a protective order.

16 Subject to and without waiving the foregoing objections, and without representing that any  
17 responsive documents exist, Samsung will produce responsive, non-privileged documents and  
18 things in its possession, custody and control discovered as a result of a reasonably diligent search.

19 **REQUEST NO. 182**

20 All documents concerning uplink transmission power control developed in whole or part  
21 by Samsung, whether or not implemented in a commercial product or standard. This includes, but  
22 is not limited to, all documents and things concerning the conception, creation, development,  
23 testing, analysis, implementation, negotiation, standardization, or selection of data packet  
24 construction, including without limitation all documents constituting or concerning:

- 25 (a) Samsung’s participation therein;
- 26 (b) HARQ;
- 27 (c) retransmission of packets;
- 28 (d) enhanced uplink dedicated channel (E-DCH);

- 1 (f) enhanced uplink dedicated physical data channel (E-DPDCH);
- 2 (g) enhanced uplink dedicated physical control channel (E-DPCCH);
- 3 (h) power factor scaling;
- 4 (i) any draft or version of any specification ultimately standardized as TS  
5 25.214 and/or TS 25.213, and any follow-on draft or version of TS 25.214  
6 and/or TS 25.213;
- 7 (j) proposals and submissions to GSM/ETSI/3GPP regarding uplink  
8 transmission power control from any party, including without limitation  
9 Samsung;
- 10 (k) selection of features and technologies for uplink transmission power  
11 control;
- 12 (l) any feature or technology considered, proposed, analyzed, or tested for  
13 inclusion in TS 25.214 and/or TS 25.213;
- 14 (n) all of Samsung's internal documentation, work, research, analysis, and  
15 testing concerning uplink transmission power control;
- 16 (o) all of Samsung's IPR declarations concerning or relating to uplink  
17 transmission power control; and
- 18 (p) all of Samsung's internal documentation concerning its IPR  
19 declarations concerning or relating to uplink transmission power control,  
20 including for example discussion or analysis about what patents to declare  
21 essential (or not declare essential) and when.

22 **OBJECTIONS AND RESPONSE TO REQUEST NO. 182:**

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  
request as vague and ambiguous. For example, the term "power factor scaling" is vague and  
ambiguous. Samsung further objects to the request as overbroad in that it is not reasonably limited  
as to the scope of documents and things it seeks. Samsung further objects to the request as  
overbroad because it calls for "all" documents. Samsung further objects to the Request to the  
extent it seeks documents that are not relevant to the claims or defenses of any party and/or not

1 reasonably calculated to lead to the discovery of admissible evidence. For instance, the Request  
2 relates to IPR not included in the patents-in-suit. Samsung further objects to the Request as  
3 duplicative of Apple’s Request No. 181. Samsung further objects to the Request to the extent it  
4 seeks documents that are not within the possession, custody, or control of Samsung. Samsung  
5 further objects to the request to the extent it seeks documents equally or more readily available to  
6 Apple than to Samsung. Samsung further objects to the Request to the extent the requested  
7 documents are publicly available. Samsung further objects to the Request to the extent it seeks  
8 documents containing confidential third party information, including information subject to a non-  
9 disclosure or other agreement between Samsung and a third party, or a protective order.

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 NO. 183**

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

18 **OBJECTIONS AND RESPONSE TO REQUEST NO. 183:**

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 vague and ambiguous. For example, the term “uplink transmission power control” is  
26 vague and ambiguous. Samsung further objects to the request as overbroad in that it is not  
27 reasonably limited as to the scope of documents and things it seeks. Samsung further objects to  
28 the request as overbroad because it calls for “all” documents. Samsung further objects to the

1 Request as duplicative of Apple’s Request No. 181. Samsung further objects to the Request to the  
2 extent it seeks documents that are not within the possession, custody, or control of Samsung.  
3 Samsung further objects to the request to the extent it seeks documents equally or more readily  
4 available to Apple than to Samsung. Samsung further objects to the Request to the extent the  
5 requested documents are publicly available. Samsung further objects to the Request to the extent  
6 it seeks documents containing confidential third party information, including information subject  
7 to a non-disclosure or other agreement between Samsung and a third party, or a protective order.

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 NO. 184**

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

17 **OBJECTIONS AND RESPONSE TO REQUEST NO. 184:**

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 the Request  
24 as vague and ambiguous. Samsung further objects to the Request as overbroad in that it is not  
25 limited to any reasonable time period and seeks documents and things from time periods not at  
26 issue in this litigation. Samsung further objects to the Request to the extent it seeks documents  
27 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead  
28 to the discovery of admissible evidence. Samsung further objects to the Request as overly

1 burdensome for its use of the overly broad definition of “Defined Wireless Standard.” Samsung  
2 further objects to the Request to the extent it seeks documents that are not within the possession,  
3 custody, or control of Samsung. Samsung further objects to the Request to the extent it seeks  
4 documents equally or more readily available to Apple than to Samsung. Samsung further objects  
5 to the Request to the extent the requested documents are publicly available. Samsung further  
6 objects to 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 NO. 185**

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

17 **OBJECTIONS AND RESPONSE TO REQUEST NO. 185:**

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 limited to any reasonable time period and seeks documents  
25 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
26 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
27 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further  
28 objects to the Request as overly burdensome for its use of the overly broad definition of “Defined

1 Wireless Standard.” Samsung further objects to the Request to the extent it seeks documents that  
2 are not within the possession, custody, or control of Samsung. Samsung further objects to the  
3 Request to the extent it seeks documents equally or more readily available to Apple than to  
4 Samsung. Samsung further objects to the Request to the extent the requested documents are  
5 publicly available. Samsung further objects to the Request to the extent it seeks documents  
6 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 NO. 186**

10 To the extent not duplicative of other requests, all transcripts of depositions or other  
11 documents containing any testimony and/or statements by Samsung, current or former Samsung  
12 affiliates or employees, or experts retained by Samsung or counsel to Samsung, relating to any  
13 litigation or judicial proceeding, including by not limited to litigation or proceedings outside of the  
14 United States, concerning IPR claimed Essential to any Defined Wireless Standard, the  
15 determination of a FRAND royalty rate for any IPR allegedly Essential to a Defined Wireless  
16 Standard, and the propriety of injunctive relief for the infringement of IPR claimed to be Essential  
17 to any Defined Wireless Standard.

18 **OBJECTIONS AND RESPONSE TO REQUEST NO. 186:**

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 limited to any reasonable time period and seeks documents  
26 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
27 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
28 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further



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

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 NO. 187**

11 To the extent not duplicative of other requests, all documents prepared by any expert,  
12 including any technical, economic, marketing or licensing experts, retained by Samsung or by  
13 counsel to Samsung for any litigation or judicial proceeding, including by not limited to litigation  
14 or proceedings outside of the United States, concerning IPR claimed Essential to any Defined  
15 Wireless Standard, the determination of a FRAND royalty rate for any IPR allegedly Essential to a  
16 Defined Wireless Standard, and the propriety of injunctive relief for the infringement of IPR  
17 claimed to be Essential to any Defined Wireless Standard.

18 **OBJECTIONS AND RESPONSE TO REQUEST NO. 187:**

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 limited to any reasonable time period and seeks documents  
26 and things from time periods not at issue in this litigation. Samsung further objects to the Request  
27 to the extent it seeks documents that are not relevant to the claims or defenses of any party and/or  
28 not reasonably calculated to lead to the discovery of admissible evidence. Samsung further

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

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:October 31, 2011

Respectfully submitted,

QUINN EMANUEL URQUHART &  
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