

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 425 Market Street
 8 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE
 william.lee@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 60 State Street
 Boston, MA 02109
 Telephone: (617) 526-6000
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)
 mark.selwyn@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 950 Page Mill Road
 Palo Alto, California 94304
 Telephone: (650) 858-6000
 Facsimile: (650) 858-6100

11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

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

17 APPLE INC.,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 22 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company,
 23 Defendants.
 24

Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF JASON R.
 BARTLETT IN SUPPORT OF
 APPLE'S OPPOSITION TO
 SAMSUNG'S MOTION TO
 COMPEL PRODUCTION OF
 DOCUMENTS RELATING TO
 APPLE'S EFFORTS TO OBTAIN
 DESIGN PATENTS RELATED TO
 THE PATENTS-IN-SUIT**

1 I, JASON R. BARTLETT, declare as follows:

2 1. I am a partner at the law firm of Morrison & Foerster LLP, counsel for Apple Inc.
3 (“Apple”). I am licensed to practice law in the State of California. I have personal knowledge of
4 the matters stated herein or understand them to be true from members of my litigation team. I
5 make this declaration in support of Apple’s Opposition to Samsung’s Motion to Compel.

6 2. In response to Samsung’s requests for production asking for documents “relating
7 to” Apple’s patents-in-suit, Apple produced well over 3,000 patents and published applications
8 that are in the family trees of or cited as prior art to the patents-in-suit, including foreign
9 counterparts, as well as thousands of non-patent prior art references, despite the significant
10 burden of production and the fact that this material is publicly available. Five foreign patents
11 related to the patents-in-suit had to be special ordered, and Apple expects to receive and produce
12 them by the end of the month. I understand from my team that there are at least 4,000 prior art
13 references for the ‘381 patent alone. Production of this material required coordination between
14 Apple’s outside counsel responsible for this litigation, Apple’s outside counsel responsible for
15 prosecution of the patents-in-suit, and outside vendors who could handle pulling the massive
16 volume of data being produced.

17 3. Attached as **Exhibit 1** is a true and correct copy of a form declaration for a utility
18 or design patent application, acquired from the USPTO website at
19 http://www.uspto.gov/web/offices/pac/mpep/mpep_e8r7_0600.pdf. This is also available online
20 at http://www.uspto.gov/web/offices/pac/mpep/documents/0600_602.htm#sect602.

21 4. Attached as **Exhibit 2** is a true and correct copy of an excerpt from the transcript
22 of the June 17, 2011 hearing before this Court regarding Samsung’s expedited discovery motion.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed this
24 21st day of March, 2012 at San Francisco, California.

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/s/ Jason R. Bartlett

Jason R. Bartlett

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Jason R. Bartlett has concurred in this filing.

Dated: March 21, 2012

/s/ Michael A. Jacobs
Michael A. Jacobs