

1 HAROLD J. MCELHINNY (CA SBN 66781)  
 HMcElhinny@mofo.com  
 2 MICHAEL A. JACOBS (CA SBN 111664)  
 MJacobs@mofo.com  
 3 JENNIFER LEE TAYLOR (CA SBN 161368)  
 JTaylor@mofo.com  
 4 JASON R. BARTLETT (CA SBN 214530)  
 JasonBartlett@mofo.com  
 5 MORRISON & FOERSTER LLP  
 425 Market Street  
 6 San Francisco, California 94105-2482  
 Telephone: 415.268.7000  
 7 Facsimile: 415.268.7522

KENNETH H. BRIDGES (CA SBN 243541)  
 kbridges@bridgesmav.com  
 MICHAEL T. PIEJA (CA SBN 250351)  
 mpieja@bridgesmav.com  
 BRIDGES & MAVRAKAKIS LLP  
 3000 El Camino Real  
 One Palo Alto Square, 2nd Floor  
 Palo Alto, CA 94306  
 Telephone: (650) 804-7800  
 Facsimile: (650) 852-9224

8 Attorneys for Plaintiff  
 APPLE INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA  
 12 SAN JOSE DIVISION

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

Case No. 11-cv-01846-LHK  
**DECLARATION OF PATRICK J.  
 ZHANG IN SUPPORT OF  
 APPLE'S MOTION FOR A  
 PRELIMINARY INJUNCTION**  
 Date: August 5, 2011  
 Time: 1:30 p.m.  
 Place: Courtroom 4, 5th Floor  
 Judge: Hon. Lucy H. Koh

1 I, PATRICK J. ZHANG, do hereby declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP, which is counsel for  
3 Plaintiff Apple Inc. I am admitted to practice law in the State of California and before this Court.  
4 I submit this declaration in support of Apple's Motion for Preliminary Injunction. I have personal  
5 knowledge of the facts stated in this declaration, and I could and would competently testify to  
6 them if called as a witness.

7 **A. Samsung's Serial Copying**

8 2. Attached as Exhibit 1 is a true and correct copy of a Wired.com Internet article  
9 dated July 15, 2010,<sup>1</sup> entitled "First Look: Samsung Vibrant Rips Off iPhone 3G Design," which  
10 reports that "Samsung's latest phone, the Vibrant, has the body of an iPhone."

11 3. Attached as Exhibit 2 is a true and correct copy of a PCWorld.com Internet article  
12 dated June 29, 2010,<sup>2</sup> which reports that the Samsung Galaxy S design is "very iPhone 3GS-like."

13 4. Attached as Exhibit 3 is a true and correct copy of a Washington Post Internet  
14 article dated July 21, 2010,<sup>3</sup> which reports that "[l]ike the European Galaxy S, the Vibrant  
15 resembles an iPhone 3GS."

16 5. Attached as Exhibit 4 is a true and correct copy of a Fastcompany.com Internet  
17 article dated March 22, 2011,<sup>4</sup> entitled "Samsung's Anti-iPad 2 Policy: Clone the Heck Out of  
18 It," which concludes that "Samsung has thrown in the towel on innovative tablet design."

19 6. Attached hereto as Exhibit 5 is a true and correct copy of a BusinessInsider.com  
20 Internet article dated April 19, 2011<sup>5</sup>, entitled "Samsung Has Been Copying Everyone Forever,  
21 Not Just Apple."

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22 <sup>1</sup> <http://www.wired.com/gadgetlab/2010/07/first-look-samsung-vibrant-rips-off-iphone-3g-design/> printed on June 28, 2011.

23 <sup>2</sup> [http://www.pcworld.com/article/200142/samsung\\_galaxy\\_s\\_how\\_does\\_it\\_measure\\_up\\_to\\_the\\_competition.html](http://www.pcworld.com/article/200142/samsung_galaxy_s_how_does_it_measure_up_to_the_competition.html) printed on June 28, 2011.

24 <sup>3</sup> <http://www.washingtonpost.com/wp-dyn/content/article/2010/07/15/AR2010071506963.html> printed on June 28, 2011.

25 <sup>4</sup> <http://www.fastcompany.com/1741859/samsungs-anti-ipad-2-policy-clone-the-heck-out-of-it> printed on June 28, 2011.

28

1           7.       Attached as Exhibit 6 is a true and correct copy of a Fastcompany.com Internet  
2 article dated September 2, 2010,<sup>6</sup> entitled “Samsung’s B+ Mentality: Find a Successful Product,  
3 Copy It Adequately.”

4           **B.       May 12 Hearing Transcript**

5           8.       Attached as Exhibit 7 is a true and correct copy of an excerpt from the transcript of  
6 the May 12, 2011 hearing on Apple’s motion for expedited discovery.

7           **C.       May 12 Samsung Handout**

8           9.       Attached as Exhibit 8 is a true and correct copy of a hand out provided by  
9 Samsung’s counsel at the May 12, 2011 hearing on Apple’s motion for expedited discovery.

10          **D.       Samsung-Identified Phones Were Released After the iPhone**

11          *Acer Stream*

12          10.       Attached as Exhibit 9 is a true and correct copy of a SlashGear.com Internet article  
13 dated May 27, 2010,<sup>7</sup> reporting Acer’s official announcement of the Acer Stream.

14          *HTC Touch Pro2*

15          11.       Attached as Exhibit 10 is a true and correct copy of a Sprint press release dated  
16 August 31, 2009,<sup>8</sup> announcing the release of the HTC Touch Pro2 on September 8, 2009.

17          *LG Axis LGAS740*

18          12.       Attached as Exhibit 11 is a true and correct copy of a Phonearena.com article dated  
19 January 13, 2011,<sup>9</sup> reporting that the LG Axis is now available through Alltel.

20 \_\_\_\_\_  
(Footnote continued from previous page.)

21                   <sup>5</sup> <http://www.businessinsider.com/samsung-designs-2011-4#ixzz1OUafB400> printed on  
22 June 28, 2011.

23                   <sup>6</sup> <http://www.fastcompany.com/1686739/the-samsung-mo-find-a-successful-product-copy-it-adequately> printed on June 29, 2011.

24                   <sup>7</sup> <http://www.slashgear.com/acer-stream-launches-with-android-2-1-snapdragon-hdmi-2787249> printed on June 28, 2011.

25                   <sup>8</sup> [http://newsroom.sprint.com/article\\_display.cfm?article\\_id=1205](http://newsroom.sprint.com/article_display.cfm?article_id=1205) printed on June 28,  
26 2011.

27                   <sup>9</sup> [http://www.phonearena.com/news/Android-2.1-powered-LG-Axis-is-now-available-for-90-through-Alltel\\_id15957](http://www.phonearena.com/news/Android-2.1-powered-LG-Axis-is-now-available-for-90-through-Alltel_id15957) printed on June 28, 2011.

1           **LG Cookie**

2           13.     Attached as Exhibit 12 is a true and correct copy of a Phonearena.com entry,<sup>10</sup>  
3 indicating that the LG Cookie was announced on September 30, 2008 and released on November  
4 26, 2008.

5           **LG Dare**

6           14.     Attached is Exhibit 13 is a true and correct copy of a CNET review of the LG  
7 Dare,<sup>11</sup> indicating that the LG Dare was released on June 26, 2008.

8           **LG Pop**

9           15.     Attached as Exhibit 14 is a true and correct copy of a Phonearena.com entry,<sup>12</sup>  
10 indicating that the LG Pop was announced on September 30, 2009 and released on October 28,  
11 2009.

12           **Motorola Atrix 4G**

13           16.     Attached as Exhibit 15 is a true and correct copy of a press release published by  
14 Motorola on January 5, 2011,<sup>13</sup> announcing the Motorola Atrix 4G.

15           **Nokia 5800xm**

16           17.     Attached as Exhibit 16 is a true and correct copy of a press release published by  
17 Nokia on October 2, 2008,<sup>14</sup> announcing the pending release of the Nokia 5800xm.

18           **Palm Pre**

19           18.     Attached as Exhibit 17 is a true and correct copy of a Sprint press release dated  
20 May 19, 2009,<sup>15</sup> announcing the release of the Palm Pre on June 6, 2009.

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21           <sup>10</sup> [http://www.phonearena.com/phones/LG-Cookie\\_id3185](http://www.phonearena.com/phones/LG-Cookie_id3185) printed on June 28, 2011.

22           <sup>11</sup> [http://reviews.cnet.com/cell-phones/lg-dare-verizon-wireless/4505-6454\\_7-33070218.html#reviewPage1](http://reviews.cnet.com/cell-phones/lg-dare-verizon-wireless/4505-6454_7-33070218.html#reviewPage1) printed on June 28, 2011

23           <sup>12</sup> [http://www.phonearena.com/phones/LG-Pop-GD510\\_id4018](http://www.phonearena.com/phones/LG-Pop-GD510_id4018) printed on June 28, 2011.

24           <sup>13</sup> <http://mediacenter.motorola.com/Press-Releases/Motorola-Mobility-and-AT-T-Announce-ATRIX-4G-the-Future-of-Mobile-Computing-353c.aspx> printed on June 28, 2011.

25           <sup>14</sup> <http://press.nokia.com/2008/10/02/nokia-amps-up-music-offering-with-new-nokia-5800-xpressmusic/> printed on June 28, 2011.

26           <sup>15</sup> [http://newsroom.sprint.com/article\\_display.cfm?article\\_id=1130](http://newsroom.sprint.com/article_display.cfm?article_id=1130) printed on June 28,  
27 2011.

1           ***RIM Blackberry Storm***

2           19.     Attached as Exhibit 18 is a true and correct copy of a press release published by  
3     Research In Motion on November 13, 2008,<sup>16</sup> announcing the release of the Blackberry Storm on  
4     November 21, 2008.

5           ***Samsung F700***

6           20.     Attached as Exhibit 19 is a true and correct copy of a press release published by  
7     Samsung on February 8, 2007,<sup>17</sup> announcing the pending release of the Samsung F700.

8           ***Samsung Galaxy i9000***

9           21.     Attached as Exhibit 20 is a true and correct copy of an article from Slashgear.com  
10    published on March 23, 2010,<sup>18</sup> reporting on the pending release of the Samsung Galaxy i9000.

11          ***Sony Ericsson Xperia Play***

12          22.     Attached as Exhibit 21 is a true and correct copy of a press release published by  
13    Sony Ericsson on February 13, 2011,<sup>19</sup> announcing the Sony Ericsson Xperia Play.

14          **E.     Prior Decree Concerning 'D087 Patent**

15          23.     Attached as Exhibit 22 is a true and correct copy of a January 5, 2011 order issued  
16    in *Apple Inc. v. Brilliant Store, Inc.*, 10-cv-2996-SBA (N.D. Cal.).

17          **F.     Apple's Products**

18               ***Original iPhone***

19          24.     Attached as Exhibit 23 is a true and correct copy of a CNN.com article dated June  
20    30, 2011,<sup>20</sup> reporting that the original iPhone went on sale on June 29, 2007 and is “turn[ing] 4  
21    years old.”

22  
23  
24               <sup>16</sup> <http://press.rim.com/partner/release.jsp?id=1891> printed on June 28, 2011.

25               <sup>17</sup> [http://www.samsung.com/us/news/newsRead.do?news\\_seq=3516](http://www.samsung.com/us/news/newsRead.do?news_seq=3516) printed on June 28,  
26    2011.

26               <sup>18</sup> [http://www.slashgear.com/samsung-galaxy-s-gt-i9000-android-2-1-smartphone-  
27    announced-2378775/](http://www.slashgear.com/samsung-galaxy-s-gt-i9000-android-2-1-smartphone-announced-2378775/) printed on June 28, 2011.

27               <sup>19</sup> [http://www.sonyericsson.com/mwcnews/xperia\\_play/](http://www.sonyericsson.com/mwcnews/xperia_play/) printed on June 28, 2011.

1           25.     Photographs of the original iPhone appearing in Apple’s Motion for a Preliminary  
2 Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are true and  
3 accurate representations of an iPhone.

4           ***iPhone 3GS***

5           26.     Attached as Exhibit 24 is a true and correct copy of CNET.com article dated June  
6 8, 2009,<sup>21</sup> reporting that the iPhone 3GS “will hit stores June 19.”

7           27.     Photographs of the iPhone 3GS appearing in Apple’s Motion for a Preliminary  
8 Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are true and  
9 accurate representations of an iPhone 3GS.

10          ***iPhone 4***

11          28.     Attached as Exhibit 25 is a true and correct copy of a CBSNews.com article dated  
12 June 30, 2011,<sup>22</sup> reporting that “[t]oday marks the first year anniversary of the iPhone 4, the most  
13 advanced mobile phone Apple released to date.”

14          29.     Photographs of the iPhone 4 appearing in Apple’s Motion for a Preliminary  
15 Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are true and  
16 accurate representations of an iPhone 4.

17          ***iPad 2***

18          30.     Attached as Exhibit 26 is a true and correct copy of a Huffingtonpost.com article  
19 dated March 10, 2011,<sup>23</sup> reporting that “[t]he new iPad 2 officially goes on sale Friday, March  
20 11.”

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21 (Footnote continued from previous page.)

22           20

23 <http://www.cnn.com/2011/TECH/innovation/06/29/original.iphone.four.years/index.html?hpt=te>  
24 [bn6](http://www.cnn.com/2011/TECH/innovation/06/29/original.iphone.four.years/index.html?hpt=te) printed on June 30, 2011.

25           21 [http://reviews.cnet.com/8301-19512\\_7-10260079-233.html](http://reviews.cnet.com/8301-19512_7-10260079-233.html) printed on June 30, 2011.

26           22 [http://www.cbsnews.com/8301-504943\\_162-20075554-10391715.html](http://www.cbsnews.com/8301-504943_162-20075554-10391715.html) printed on June  
30, 2011.

27           23 [http://www.huffingtonpost.com/2011/03/10/ipad-2-release-day-2011\\_n\\_834017.html](http://www.huffingtonpost.com/2011/03/10/ipad-2-release-day-2011_n_834017.html)  
28 printed on June 30, 2011.

1 31. Photographs of the iPad 2 appearing in Apple’s Motion for a Preliminary  
2 Injunction, filed herewith, are true and accurate representations of an iPad 2.

3 **G. Public Reaction to Apple’s Designs**

4 32. Attached as Exhibit 27 is a true and correct copy of a *New York Times* review of  
5 the iPhone dated January 11, 2007,<sup>24</sup> entitled “Apple Waves Its Wand at the Phone.”

6 33. Attached as Exhibit 28 is a true and correct copy of a *New York Times* article dated  
7 June 27, 2007,<sup>25</sup> reporting that “in the last six months, Apple’s iPhone has been the subject of  
8 11,000 print articles” and “turns up about 69 million hits on Google.” The article further states  
9 that “The iPhone is revolutionary,” and describes the iPhone as “a tiny, gorgeous hand-hand  
10 computer.” “The phone is so sleek and thin, it makes Treos and Blackberrys look obese.”

11 34. Attached as Exhibit 29 is a true and correct copy of a *Time* article dated November  
12 1, 2007,<sup>26</sup> naming the iPhone its “Invention Of the Year,” and listing the iPhone’s design (“The  
13 iPhone is pretty”) as the first reason that it is “the best thing invented this year.”

14 35. Attached as Exhibit 30 is a true and correct copy of a Korea JoongAng Daily  
15 Internet article dated February 18, 2008,<sup>27</sup> entitled “Apple iPhone Tops List of Innovative  
16 inventions,” reporting the results of a survey of 599 Korean CEO’s by Samsung Economic  
17 Research Institute, in which the CEOs indicated that the “iPhone’s sleek design caught their eye.”

18 36. Attached as Exhibit 31 is a true and correct copy of Walt Mossberg’s March 31,  
19 2010 review of the iPad for WSJ.com,<sup>28</sup> which refers to the iPad as “this beautiful new touch-  
20 screen device from Apple.”

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21 <sup>24</sup> <http://www.nytimes.com/2007/01/11/technology/11pogue.html?sq=pogue> printed on  
22 June 28, 2011.

23 <sup>25</sup> <http://www.nytimes.com/2007/06/27/technology/circuits/27pogue.html?pagewanted=2&ref=iphone>  
24 [ne](http://www.nytimes.com/2007/06/27/technology/circuits/27pogue.html?pagewanted=2&ref=iphone) printed on June 28, 2011.

25 <sup>26</sup> [http://www.time.com/time/specials/2007/article/0,28804,1677329\\_1678542\\_1677891,00.html](http://www.time.com/time/specials/2007/article/0,28804,1677329_1678542_1677891,00.html)  
26 printed on June 30, 2011.

27 <sup>27</sup> <http://joongangdaily.joins.com/article/view.asp?aid=2886322> printed on June 30, 2011.

28 <sup>28</sup> <http://allthingsd.com/20100331/apple-ipad-review/> printed on June 28, 2011.

1           37. Attached as Exhibit 32 is a true and correct copy of a Wired.com review of the  
2 iPad dated April 1, 2010,<sup>29</sup> entitled “Why We Are Obsessed With the iPad.”

3           **H. Samsung’s Products**

4           ***Galaxy S 4G***

5           38. Attached as Exhibit 33 is a true and correct copy of a PCMag.com article dated  
6 February 14, 2011,<sup>30</sup> reporting on T-Mobile’s announcement that the Galaxy S 4G “will launch  
7 on February 23 for \$149.99.”

8           39. Photographs of the Samsung Galaxy S 4G appearing in Apple’s Motion for a  
9 Preliminary Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are  
10 true and accurate representations of a Galaxy S 4G.

11           ***Droid Charge***

12           40. Attached as Exhibit 34 is a true and correct copy of Channelpartneronline.com  
13 article dated May 13, 2011,<sup>31</sup> reporting that the delayed Samsung Droid Charge “is scheduled to  
14 go on sale Saturday [May 14, 2011].”

15           ***Infuse 4G***

16           41. Attached as Exhibit 35 is a true and correct copy of a CNET article May 5, 2011,<sup>32</sup>  
17 reporting that “[a]t a special event in New York today, AT&T and Samsung announced that the  
18 Infuse 4G would be available starting May 15 for \$199.99.”

19           42. Photographs of the Samsung Infuse 4G appearing in Apple’s Motion for a  
20 Preliminary Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are  
21 true and accurate representations of an Infuse 4G.

22  
23  
24           <sup>29</sup> <http://www.wired.com/gadgetlab/2010/04/apple-ipad-hands-on/> printed on June 28,  
2011.

25           <sup>30</sup> <http://www.pcmag.com/article2/0,2817,2380330,00.asp> printed on June 28, 2011.

26           <sup>31</sup> <http://www.channelpartneronline.com/news/2011/05/droid-charge-going-on-sale-tomorrow-report.aspx> printed on June 28, 2011.

27           <sup>32</sup> [http://reviews.cnet.com/8301-19736\\_7-20059853-251.html](http://reviews.cnet.com/8301-19736_7-20059853-251.html) printed on June 28, 2011.



1           ***Galaxy Tab***

2           43.     Attached as Exhibit 36 is a true and correct copy of a Huffingtonpost.com article  
3 dated November 11, 2010,<sup>33</sup> entitled “Samsung Galaxy Tab REVIEW ROUNDUP: Critics React  
4 to iPad’s 7-Inch Android Challenger (PHOTOS),” reporting that the Galaxy Tabs “are now  
5 available from T-Mobile and Verizon.”

6           ***Galaxy Tab 10.1***

7           44.     Attached as Exhibit 37 is a true and correct copy of an Engadget article dated June  
8 8, 2011,<sup>34</sup> reporting that “[a]t noon Eastern Time today, Best Buy’s New York City store at Union  
9 Square will start selling Samsung’s [Galaxy Tab 10.1].”

10          45.     Photographs of the Samsung Galaxy Tab 10.1 appearing in Apple’s Motion for a  
11 Preliminary Injunction and the supporting Declaration of Cooper C. Woodring, filed herewith, are  
12 true and accurate representations of a Galaxy Tab 10.1.

13           **I.     Nokia Answer and Counterclaim Showing Assertion of ’381 Patent**

14          46.     Attached as Exhibit 38 is a true and correct copy of excerpts from Apple’s answer  
15 and counterclaim in *Nokia Corp. v. Apple Inc.*, No. 1:09-cv-00791, Dkt. No. 14 (D. Del.).

16           **J.     Nokia Action Joint Claim Construction Chart**

17          47.     Attached as Exhibit 39 is a true and correct copy of the parties’ February 23, 2011  
18 Joint Claim Chart in *Nokia Corp. v. Apple Inc.*, No. 1:09-cv-00791, Dkt. No. 227 (D. Del.).

19           **K.     Nokia Requests *Ex Parte* Re-Examination of ’381 Patent**

20          48.     Attached as Exhibit 40 is a true and correct copy of excerpts from Nokia’s opening  
21 brief in support of its motion to stay Apple’s patent claims pending reexamination in *Nokia Corp.*  
22 *v. Apple Inc.*, 1:09-cv-00791, Dkt. No. 81(D. Del.), and excerpts from Exhibit 8 of the supporting  
23 declaration, Dkt. No. 82-1.

24  
25           

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<sup>33</sup> [http://www.huffingtonpost.com/2010/11/11/samsung-galaxy-tab-review-roundup\\_n\\_782024.html#s180055&title=New\\_York\\_Times](http://www.huffingtonpost.com/2010/11/11/samsung-galaxy-tab-review-roundup_n_782024.html#s180055&title=New_York_Times) printed on June 30, 2011.

26           <sup>34</sup> <http://www.engadget.com/2011/06/08/samsung-galaxy-tab-10-1-on-sale-at-nyc-best-buy-today-up-for-pr/> printed on June 28, 2011.

1           **L.     Nokia’s Invalidation Contentions**

2           49.     Attached as Exhibit 41 is a true and correct copy of excerpts from Nokia’s  
3     November 15, 2010 supplemental interrogatory responses in *Nokia Corp. v. Apple Inc.*, No. 1:09-  
4     cv-00791 (D. Del.).

5           **M.     ’381 Patent Re-Examination Certificate**

6           50.     Attached as Exhibit 42 is a true and correct copy of the certified re-examination  
7     certificate for U.S. Patent No. 7,469,381 issued by the U.S. Patent & Trademark Office.

8           **N.     Apple’s Complaint in *Apple v. HTC* Showing Assertion of ’381 Patent**

9           51.     Attached as Exhibit 43 is a true and correct copy of excerpts from Apple’s  
10    complaint in *Apple Inc. v. HTC Corp.*, No. 1:10-cv-00167 (D. Del.).

11          **O.     Samsung’s Newly Released Products Include Significant Upgrades**

12          52.     Attached as Exhibit 44 is a true and correct copy of Samsung’s web site page for  
13    the Galaxy S 4G,<sup>35</sup> which touts the new features of that phone, including its ability to use fourth  
14    generation or “4G” communication networks.

15          53.     The PCMag.com article attached as Exhibit 33 also reports that “The Samsung  
16    Galaxy S 4G is T-Mobile’s first high-speed HSPA+ 21 phone.”

17          54.     Attached as Exhibit 45 is a true and correct copy of Samsung’s web site page for  
18    the Infuse 4G,<sup>36</sup> which touts the new features of that phone, including its status as “The Nation’s  
19    Thinnest 4G Smartphone” and “Samsung’s thinnest smartphone,” and its “Large 4.5” SUPER  
20    AMOLED Plus” touch screen.

21          55.     The CNET article attached as Exhibit 35 also reports on the improved features of  
22    the Infuse 4G:

23                   The main attraction of the Infuse 4G though is the Super AMOLED  
24                   Plus display. It offers 50 percent more subpixels than previous  
                    generation of Super AMOLED touch screens, so you get better

25                   

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26                   <sup>35</sup> <http://www.samsung.com/us/mobile/cell-phones/SGH-T959HABTMB> printed on June  
27                   28, 2011.

28                   <sup>36</sup> <http://www.samsung.com/us/mobile/cell-phones/SGH-I997ZKAATT> printed on June  
                    28, 2011.

1 contrast and outdoor visibility. The display is noticeably sharp and  
2 vibrant, but even more so, when you put it next to one of the older  
3 [Samsung] Galaxy models. The Samsung Infuse 4G also steps it up  
4 a notch with a 1.2GHz processor and 16GB of internal memory. It  
5 will also be the first HSPA+ Category 14 (21Mbps) 4G phone for  
6 AT&T and it's HSUPA-enabled at launch.

7 56. Attached as Exhibit 46 is a true and correct copy of Samsung's web site page for  
8 the Droid Charge,<sup>37</sup> which touts the new features of that phone, including its "4G Speed," "Slim  
9 Design," and 4.3" Super AMOLED Plus Touch Screen Display."

10 57. Attached as Exhibit 47 is a true and correct copy of Samsung's web site page for  
11 the Galaxy Tab 10.1,<sup>38</sup> which touts the new features of that device, including its "brilliant 10.1  
12 [inch] display," "The power and speed of Android 3.1" operating system, and its ".34 [inch]"  
13 thickness.

14 **P. Apple's Patents At Issue**

15 58. Attached as Exhibit 48 is a true and correct copy of U.S. Design Patent  
16 No. D618,677.

17 59. Attached as Exhibit 49 is a true and correct copy of U.S. Design Patent  
18 No. D593,087.

19 60. Attached as Exhibit 50 is a true and correct copy of U.S. Design Patent  
20 No. D504,889.

21 61. Attached as Exhibit 51 is a true and correct copy of U.S. Patent No. 7,469,381.

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Dated: July 1, 2011

24 \_\_\_\_\_  
25 /s/ Patrick J. Zhang  
26 Patrick J. Zhang

27 <sup>37</sup> <http://www.samsung.com/us/mobile/cell-phones/SCH-I510RAAVZW> printed on June  
28 28, 2011.

<sup>38</sup> <http://www.samsung.com/us/mobile/galaxy-tab-wifi-only/GT-P7510UWVXAR> printed  
on June 28, 2011.

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I, JASON R. BARTLETT, am the ECF User whose ID and password are being used to file the following document: DECLARATION OF PATRICK J. ZHANG IN SUPPORT OF APPLE'S MOTION FOR A PRELIMINARY INJUNCTION. In compliance with General Order 45, X.B., I hereby attest that Patrick J. Zhang has concurred in this filing.

Dated: July 1, 2011

**MORRISON & FOERSTER LLP**

By: /s/ Jason R. Bartlett  
JASON R. BARTLETT