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14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 16

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 19

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 24 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 25 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 26

27 Defendants.
 28

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF CARL G.
 ANDERSON IN SUPPORT OF
 SAMSUNG'S OPPOSITION TO APPLE'S
 ADMINISTRATIVE REQUEST FOR
 LEAVE TO FILE SUPPLEMENTAL
 DECLARATION OF ERIK J. OLSON IN
 SUPPORT OF APPLE'S RULE 37(b)(2)
 MOTION**

Date: April 9, 2012
 Time: 10:00 a.m.
 Place: Courtroom 5, 4th Floor
 Judge: Hon. Paul S. Grewal

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I, Carl G. Anderson, declare as follows:

1. I am an attorney admitted to practice in the State of California and I am an associate of the law firm of Quinn Emanuel Urquhart & Sullivan, LLP. Except as otherwise stated, I have personal firsthand knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. Attached hereto as Exhibit A is a true and correct copy of an April 11, 2012 letter from Thomas Watson to Mia Mazza.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts of the April 9, 2012 hearing in this matter.

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

Executed this 22nd day of April, 2012, in San Francisco, California.



Carl G. Anderson