

EXHIBIT B

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

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK

19 Plaintiff,

20 vs.

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

**SAMSUNG'S FIRST SET OF REQUESTS
FOR PRODUCTION TO APPLE INC.**

24 Defendants.
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1 **REQUEST FOR PRODUCTION NO. 9:**

2 All DOCUMENTS relating to or evidencing any Licenses, or the negotiation thereof,
3 relating to the APPLE ACCUSED PRODUCTS or the technology claimed or disclosed by the
4 SAMSUNG PATENTS-IN-SUIT.

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

6 All DOCUMENTS concerning any COMMUNICATIONS with third parties regarding
7 SAMSUNG patents or licenses under SAMSUNG patents, including any communications with
8 Intel, Infineon and/or Qualcomm.

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

10 All licenses in which You have received or conveyed rights under a patent relating to the
11 APPLE ACCUSED PRODUCTS.

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

13 All Licenses, whether You are the licensor or licensee, relating to any of the APPLE
14 ACCUSED PRODUCTS, including but not limited to licenses relating to the technologies claimed
15 or disclosed by the SAMSUNG PATENTS-IN-SUIT.

16 **REQUEST FOR PRODUCTION NO. 13:**

17 All licenses on which you intend to rely for any purpose in This Lawsuit.

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

19 DOCUMENTS sufficient to identify any databases for storing data relating to any of the
20 APPLE ACCUSED PRODUCTS.

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

22 All DOCUMENTS related to the use, operation, intended operation, or intended use of the
23 APPLE ACCUSED PRODUCTS by consumers, including, but not limited to, instructions, user
24 manuals, service manuals, training materials, packaging materials, marketing materials, or any
25 materials used to assist consumers to use the APPLE ACCUSED PRODUCTS.

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

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1 All DOCUMENTS relating to This Lawsuit, including, but not limited to, press releases,
2 submissions to government agencies, and COMMUNICATIONS with third parties.

3 **REQUEST FOR PRODUCTION NO. 39:**

4 All DOCUMENTS relating to any Software used to operate or enable any accused
5 functionality of any of the APPLE ACCUSED PRODUCTS, including but not limited to release
6 notes, algorithms, flowcharts, diagrams, notes, and manuals.

7 **REQUEST FOR PRODUCTION NO. 40:**

8 All DOCUMENTS relating to any COMMUNICATIONS with any third parties regarding
9 Samsung or the SAMSUNG PATENTS-IN-SUIT.

10 **REQUEST FOR PRODUCTION NO. 41:**

11 All DOCUMENTS relating to any joint defense agreement in This Lawsuit or in any
12 related litigation.

13 **REQUEST FOR PRODUCTION NO. 42:**

14 All DOCUMENTS relating to the pricing of the APPLE ACCUSED PRODUCTS.

15 **REQUEST FOR PRODUCTION NO. 43:**

16 All business plans, strategic plans, operating plans, financial plans, sales plans, and capital
17 or investment plans concerning the APPLE ACCUSED PRODUCTS.

18 **REQUEST FOR PRODUCTION NO. 44:**

19 All DOCUMENTS and things concerning the market or demand for the APPLE
20 ACCUSED PRODUCTS.

21 **REQUEST FOR PRODUCTION NO. 45:**

22 All DOCUMENTS relating to any product reviews, comparisons, or usability tests or
23 evaluations of any of the APPLE ACCUSED PRODUCTS.

24 **REQUEST FOR PRODUCTION NO. 46:**

25 All DOCUMENTS that You have provided to or received from any person who may
26 testify at any hearing in This Lawsuit.

27 **REQUEST FOR PRODUCTION NO. 47:**

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1 For each person You intend to rely on as an expert witness, all DOCUMENTS concerning
2 (a) the qualifications of the expert; (b) the subject matter on which the expert is expected to testify;
3 (c) the substance of the facts and opinions to which the expert is expected to testify; (d) each and
4 every DOCUMENT the expert has reviewed or relied upon in formulating his or her opinion and
5 each and every DOCUMENT the expert will assert supports each of his or her opinions and each
6 fact; and (e) all reports prepared by the expert.

7 **REQUEST FOR PRODUCTION NO. 48:**

8 All transcripts of prior testimony (whether at deposition, trial, declaration, or affidavit) by
9 any expert retained to testify in This Lawsuit.

10 **REQUEST FOR PRODUCTION NO. 49:**

11 All DOCUMENTS and COMMUNICATIONS with an expert witness who is expected to
12 testify in This Lawsuit that (i) relate to compensation for the expert's study or testimony; (ii)
13 identify facts or data that APPLE'S attorney provided and that the expert considered informing the
14 opinions to be expressed; (iii) identify assumptions that APPLE'S attorney provided and that the
15 expert relied on in forming the opinions to be expressed.

16 **REQUEST FOR PRODUCTION NO. 50:**

17 All settlement agreements relating to any of the APPLE ACCUSED PRODUCTS,
18 SAMSUNG PATENTS-IN-SUIT, OR APPLE IP, including but not limited to settlement
19 agreements relating to the technologies claimed or disclosed by the SAMSUNG PATENTS-IN-
20 SUIT, OR APPLE IP.

21 **REQUEST FOR PRODUCTION NO. 51:**

22 All DOCUMENTS and COMMUNICATIONS relating to any settlement agreement
23 relating to any of the APPLE ACCUSED PRODUCTS.

24 **REQUEST FOR PRODUCTION NO. 52:**

25 All DOCUMENTS and COMMUNICATIONS relating to any investigation concerning
26 any of the APPLE ACCUSED PRODUCTS.

27 **REQUEST FOR PRODUCTION NO. 53:**

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1 All DOCUMENTS, COMMUNICATIONS, and things concerning the performance,
2 advantages, disadvantages, problems, features, commercial or technical benefits, or improvements
3 of any alleged invention in any of the APPLE IP.

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

5 All DOCUMENTS, COMMUNICATIONS, and things concerning patents, publications,
6 abstracts, papers, articles, presentations, or speeches invented, authored or given, in whole or in
7 part, by any inventor of the APPLE IP that relate to the subject matter of the APPLE IP.

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

9 All DOCUMENTS and COMMUNICATIONS concerning prior testimony of any inventor
10 of the APPLE IP.

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

12 All prior art to the APPLE IP identified at any time to APPLE as potentially or allegedly
13 invalidating prior art to the APPLE IP.

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

15 All DOCUMENTS and COMMUNICATIONS concerning the patentability, novelty,
16 scope, infringement, validity, invalidity, enforceability or unenforceability of any claim in any of
17 the APPLE IP.

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

19 All DOCUMENTS and things relating to any information, including patents, publications,
20 prior knowledge, public uses, sales, or offers for sale, that may constitute, contain, disclose, refer
21 to, relate to, or embody any prior art to any alleged invention claimed by the APPLE IP.

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

23 All DOCUMENTS and things relating to the initial offer for sale, initial manufacture,
24 initial use, initial sale, initial public use, initial shipment, initial announcement, or initial
25 disclosure of a product embodying any claim of the APPLE IP.

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

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1 IN-SUIT or SAMSUNG PATENTS-IN-SUIT, or patents related to same, or the subject matter
2 thereof.

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

4 DOCUMENTS sufficient to identify every attempt by APPLE to enforce the APPLE IP or
5 foreign counterparts, either in the United States or abroad.

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

7 All DOCUMENTS and COMMUNICATIONS regarding APPLE'S formal or informal
8 policies, procedures, practices, or guidelines for licensing, sublicensing or assigning rights to the
9 APPLE IP or other patents.

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

11 All DOCUMENTS concerning the infringement or non-infringement of any of the claims
12 of any of the APPLE IP by any entity or person.

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

14 All DOCUMENTS regarding any instrumentalities that APPLE contends or has contended
15 infringe any of the APPLE IP.

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

17 All DOCUMENTS and things in your possession concerning any communications or
18 correspondence between APPLE and any alleged infringer of any of the APPLE IP.

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

20 All DOCUMENTS and things relating to any alleged notice given by APPLE to
21 SAMSUNG reflecting APPLE'S contention that SAMSUNG was, is, or possibly could be
22 infringing any of the APPLE IP.

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

24 All DOCUMENTS and things relating to APPLE'S acquisition of SAMSUNG accused
25 products.

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

1 All DOCUMENTS and things relating to APPLE'S analysis, consideration, or evaluation
2 of whether any SAMSUNG product, device, apparatus, method, process, or system infringes any
3 of the APPLE IP, including, without limitation, all documents and things concerning any test,
4 evaluation, or reverse engineering of any SAMSUNG product, device, apparatus, method, process,
5 or system.

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

7 All DOCUMENTS concerning your contention that APPLE is entitled to damages from
8 Samsung.

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

10 All DOCUMENTS, COMMUNICATIONS and things concerning the *Georgia Pacific*
11 factors as those factors relate to your claim for damages arising from SAMSUNG's alleged
12 infringement of the APPLE PATENTS-IN-SUIT.
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14 **REQUEST FOR PRODUCTION NO. 130:**

15 All DOCUMENTS, COMMUNICATIONS and things concerning any analyses, studies,
16 reports, memoranda, opinions, advice, communications or correspondence by APPLE, regarding
17 any commercialization any of the APPLE PATENTS-IN-SUIT or APPLE instrumentalities,
18 including marketing plans, market demand or market share analysis (including both projected and
19 actual).
20

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

22 All DOCUMENTS regarding the market for any of the APPLE PATENTS-IN-SUIT
23 including documents regarding competitors in the industry, prices, revenues, profits, product
24 designs of any instrumentality that competes with any APPLE instrumentality.
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26 **REQUEST FOR PRODUCTION NO. 132:**

27 All DOCUMENTS related to APPLE'S actual and projected net profits or losses on sales,
28 licenses, distributions or other transfers of any APPLE PATENT-IN-SUIT or APPLE

1 **REQUEST FOR PRODUCTION NO. 192:**

2 DOCUMENTS sufficient to evidence all trademark and trade dress rights Apple has in
3 each of the APPLE TRADE DRESS and APPLE TRADEMARKS.

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6 DATED: August 3, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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8

9 By /s/ Victoria F. Maroulis

10 Charles K. Verhoeven
11 Kevin P.B. Johnson
12 Victoria F. Maroulis
13 Michael T. Zeller
14 Attorneys for SAMSUNG ELECTRONICS CO.,
15 LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC., and SAMSUNG
17 TELECOMMUNICATIONS AMERICA, LLC

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 3, 2011, I caused **SAMSUNG'S FIRST SET OF**
3 **REQUESTS FOR PRODUCTION TO APPLE INC.** to be electronically served on the
4 following via email:

5 **ATTORNEYS FOR APPLE INC.**

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24
25 I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood
26 Shores, California on August 3, 2011.

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28 _____
/s/ Mark Tung