

# EXHIBIT C

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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,

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,

24 Defendants.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG ELECTRONICS CO. LTD.'S  
FIRST SET OF INTERROGATORIES TO  
APPLE INC.**

1 PATENTED PRODUCT was first sold in the United States, and whether each PATENTED  
2 PRODUCT was marked pursuant to 35 U.S.C § 287 or otherwise, how each product was marked  
3 including the location and manner of the marking, the individuals or entities that marked each  
4 product, and any interruptions to or other changes in the practice of marking the PATENTED  
5 PRODUCT since it was first marked.

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7 **INTERROGATORY NO. 5:**

8 Separately for each of the APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS and  
9 APPLE TRADEMARKS, IDENTIFY every product manufactured, used, sold, offered for sale, or  
10 imported into the United States since 2005 that YOU believe uses or may use any protected  
11 design, trademark, trade dress, or invention of the APPLE PATENTS-IN-SUIT, APPLE TRADE  
12 DRESS, and APPLE TRADEMARKS and the date(s) on which you believe that use occurred.  
13 The products shall be identified by product name, product manufacturer, telecommunications  
14 carrier (if applicable), date of product announcement, date of product release, and appearance of  
15 product – including front, back, and side images.

16  
17 **INTERROGATORY NO. 6:**

18 Separately for each of the APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS, and  
19 APPLE TRADEMARKS, IDENTIFY any and all persons to whom YOU have ever licensed or  
20 offered to license, or persons who have requested to license, or to whom YOU have granted or  
21 offered to grant any other rights under the patent, trade dress, or trademark, including the status of  
22 those requests and offers, whether continuing, successful, or terminated, and identify (by Bates  
23 number) all DOCUMENTS RELATED to any such license, offer, request, or other grant of rights.

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25 **INTERROGATORY NO. 7:**

26 Separately for each of the APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS and  
27 APPLE TRADEMARKS state all facts supporting any contention by APPLE that Samsung has  
28 willfully infringed, diluted, or falsely designated the origin of its products for each patent, trade

1 Describe in detail the factual basis for every claim, affirmative defense and every  
2 counterclaim APPLE has asserted or will assert in this lawsuit.

3  
4 **INTERROGATORY NO. 15:**

5 IDENTIFY each person working for or on behalf of Apple who has ever analyzed use of  
6 any APPLE PATENTS-IN-SUIT, APPLE TRADE DRESS or APPLE TRADEMARKS by  
7 someone other than YOU, and the subject matter of their analysis.

8  
9 **INTERROGATORY NO. 16:**

10 IDENTIFY all facts RELATING TO studies, including formal or informal analysis,  
11 investigation, surveys, focus groups, consumer research, or other information or reports that relate  
12 to, support, or refute YOUR claims in this action, including, for each such study, when it was  
13 commissioned, conducted, and completed, by whom it was conducted, and its conclusions.

14  
15 **INTERROGATORY NO. 17:**

16 Describe all instances known to YOU of confusion, including mistake, or deception  
17 RELATING TO any of the APPLE TRADE DRESS or APPLE TRADEMARKS. For each  
18 instance described, your response should include when and how you became aware of the  
19 instance, when the instance occurred, all persons with knowledge of such instance, the source of  
20 their knowledge, the circumstances reflecting the confusion, the IDENTITY of the SAMSUNG  
21 ACCUSED PRODUCT allegedly giving rise to the confusion, the IDENTITY of all confused  
22 persons, and the IDENTITY of all DOCUMENTS and things supporting or refuting your response  
23 to this Interrogatory.

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25 **INTERROGATORY NO. 18:**

26 IDENTIFY all facts supporting your contentions regarding the fame, distinctiveness,  
27 secondary meaning, and/or strength of the APPLE TRADE DRESS and APPLE TRADEMARKS.

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DATED: August 3, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria F. Maroulis  
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Kevin P.B. Johnson  
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Michael T. Zeller  
Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC

1 **CERTIFICATE OF SERVICE**

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

5 **ATTORNEYS FOR APPLE INC.**

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

25  
26 /s/ Mark Tung  
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