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13 Attorneys for SAMSUNG ELECTRONICS  
 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

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

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

25 Defendants.  
 26

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S FOURTH SET OF  
 INTERROGATORIES TO APPLE INC.**

1 **INTERROGATORY NO. 66:**

2 IDENTIFY any cost APPLE would incur by switching from: a) an INPUT  
3 TECHNOLOGY to an alternative technology; and b) WCDMA to an alternative standard,  
4 including CDMA2000.

5  
6 **INTERROGATORY NO. 67:**

7 From January 1, 2007 to the present, for each model and version of each of the APPLE  
8 ACCUSED PRODUCTS, including those identified in response to Interrogatory 19, IDENTIFY  
9 by quarter (calendar and fiscal) the amount in gross margin or gross profit that APPLE has  
10 obtained from the sale of accessories or other services that are designed to work with any APPLE  
11 ACCUSED PRODUCT, including but not limited to sales from iTunes, sales from APPLE'S App  
12 Store, and sales of products sold by a third-party for which APPLE receives revenue from the  
13 third-party.

14  
15 **INTERROGATORY NO. 68:**

16 Separately for each APPLE DESIGN PATENT and APPLE TRADE DRESS, state fully  
17 and in detail all facts that support YOUR contention as to the non-functionality of any claimed  
18 feature, element or combination of features or elements.

19  
20 **INTERROGATORY NO. 69:**

21 Separately for each APPLE TRADE DRESS and APPLE TRADEMARK, state the date on  
22 which YOU contend such trade dress and trademark became famous and acquired secondary  
23 meaning and state fully and in detail all facts that support YOUR contention that such trade dress  
24 and trademark became famous and acquired secondary meaning as of that date.

25  
26 **INTERROGATORY NO. 70:**

27 Separately for each APPLE TRADE DRESS, state fully and in detail all facts that support  
28 YOUR contention that SAMSUNG is diluting or has diluted such trade dress.

1 **INTERROGATORY NO. 71:**

2 Separately for each SAMSUNG product or product packaging that YOU contend infringes  
3 any APPLE TRADE DRESS or APPLE TRADEMARK, state fully and in detail on a trade dress-  
4 by-trade dress and trademark-by-trademark basis all facts that support YOUR contention that the  
5 SAMSUNG product or product packaging is likely to cause confusion, cause mistake, or deceive  
6 consumers as to the affiliation, connection, or association of SAMSUNG with APPLE, or as to  
7 origin, sponsorship, or approval by APPLE of SAMSUNG'S goods, services or commercial  
8 activities.

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10 **INTERROGATORY NO. 72:**

11 Separately for each SAMSUNG product that YOU contend infringes any APPLE DESIGN  
12 PATENT, state fully and in detail on a patent-by-patent basis all facts supporting YOUR  
13 contention of infringement, describe fully and in detail on a patent-by-patent basis where each  
14 claimed element or feature of the patent is found on the accused SAMSUNG product and provide  
15 a chart identifying fully and in detail on a patent-by-patent basis specifically where each claimed  
16 element or feature is found on the accused SAMSUNG product.

17  
18 **INTERROGATORY NO. 73:**

19 Separately, fully, and in detail for each of the SAMSUNG PATENTS-IN-SUIT,  
20 IDENTIFY and explain any design-around and/or alleged alternative technology or method that  
21 can be used as an alternative to the patented technology, including but not limited to: (a) a  
22 description of the alleged design-around; (b) a description of when and how the alleged design-  
23 around was developed; (c) the identity of individuals involved in developing the alleged design-  
24 around, including their titles and departments if they are or were APPLE employees; and (d) dates  
25 when the alleged design-around was incorporated into the APPLE ACCUSED PRODUCTS.

1 **INTERROGATORY NO. 80:**

2 IDENTIFY with particularity all alleged trade dresses that YOU claim are infringed by  
3 SAMSUNG, including each and every element alleged to be a component thereof.

4  
5

6 DATED: February 7, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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9 By /s/ Victoria F. Maroulis

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12 Victoria F. Maroulis  
13 Michael T. Zeller  
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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 February 7, 2012, I caused **SAMSUNG'S FOURTH SET OF**  
3 **INTERROGATORIES TO APPLE INC.** to be electronically served on the following via email:

4 **ATTORNEYS FOR APPLE INC.**

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23

24 I declare under penalty of perjury that the foregoing is true and correct. Executed in Los  
25 Angeles, California on February 7, 2012.

26

27

/s/ Kara M. Borden

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