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13 Attorneys for SAMSUNG ELECTRONICS CO.,  
 LTD., SAMSUNG ELECTRONICS AMERICA,  
 14 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 Defendant.  
 26

CASE NO. 11-cv-01846-LHK

**DECLARATION OF CLIFTON  
 FORLINES, PH.D.**

1 DECLARATION OF CLIFTON FORLINES

2 I, Clifton Forlines, declare:

3 1. I have personal knowledge of the facts set forth herein, and am competent to testify  
4 to the same.

5 2. I am currently a Senior Software Engineer at Draper Laboratory working in the  
6 Human-Centered Engineering Group. My responsibilities include conducting contextual inquiries  
7 with end-users, designing and implementing user interfaces, building rapid prototypes of desktop  
8 and mobile systems, and leading a software development team.

9 3. I was previously a Research Scientist at the Mitsubishi Electric Research  
10 Laboratories ("MERL"), where I was part of the team that developed the DiamondTouch Table.

11 4. I obtained a B.A. in Industrial Design from College of Fine Arts, Carnegie Mellon  
12 University in 1999. In 2001, I obtained a M.S. in Human-Computer Interaction and M.F.A. in  
13 Entertainment Technology from School of Computer Science, Carnegie Mellon University. In  
14 2009, I obtained a Ph.D. in Computer Science from Department of Computer Science, University  
15 of Toronto.

16 5. "Tablecloth" refers to the Tablecloth application running on the MERL  
17 DiamondTouch table. Tablecloth makes use of a software toolkit called DTFlash that runs on the  
18 MERL DiamondTouch table.

19 6. On or around March 20, 2012, I reviewed the source code for Tablecloth.  
20 Tablecloth is a very simple demo application [REDACTED] On or  
21 around March 22, 2012, I also had a telephone conversation with Andries van Dam regarding my  
22 review and analysis of the Tablecloth source code.

23 7. Based on my review of the Tablecloth source code, [REDACTED] k

24 [REDACTED] p  
25 [REDACTED]

26 8. I also confirmed in the source code that [REDACTED] e

27 [REDACTED] e  
28 [REDACTED]

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[REDACTED]

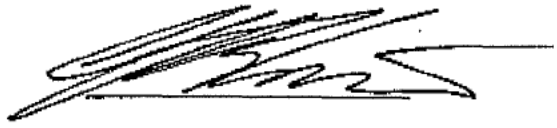
9. After the user has scrolled beyond the edge of the second instance of image, if the user then lifts her finger from the screen, the Tablecloth application scrolls the image back to the initial position. The source code that provides this functionality [REDACTED]  
[REDACTED]

10. I have reviewed the video files attached as Exhibits 4 and 5 to Declaration of Adam Bogue. The video files show the operation of the Tablecloth application consistent with the source code of Tablecloth.

11. The foregoing is based on my personal knowledge of the facts as set forth above, to the best of my knowledge and recollection. I am competent to testify to the same, and if so called to testify, I would testify to the same.

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

Executed in Tysons Corner, Virginia on May 17, 2012



Clifton Forlines