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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 Defendants.  
 27

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

**SUPPLEMENTAL DECLARATION OF  
 CHRISTOPHER E. PRICE IN SUPPORT  
 OF SAMSUNG'S MOTION TO STRIKE  
 EXPERT REPORTS**

Date: June 26, 2012  
 Time: 10:00 a.m.  
 Place: Courtroom 5, 4th Floor  
 Judge: Hon. Paul S. Grewal

**REDACTED**

1 **SUPPLEMENTAL DECLARATION OF CHRISTOPHER E. PRICE**

2 I, Christopher E. Price, declare as follows:

3 1. I am Of Counsel with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,  
4 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung  
5 Telecommunications America, LLC (collectively, "Samsung"). I submit this supplemental  
6 declaration in support of Samsung's Motion to Strike Expert Testimony Based on Undisclosed  
7 Facts and Theories. I have personal knowledge of the facts set forth in this supplemental  
8 declaration, except as otherwise noted, and, if called upon as a witness, I could and would testify  
9 to such facts under oath.

10 2. On April 21, 2012, five days after Samsung filed its Motion to Strike – which  
11 seeks in part to strike portions of the reports of Apple's damages expert due to Apple's deficient,  
12 incomplete, belated, and contradictory production of licensing information – Apple produced for  
13 the first time [REDACTED]

14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]

17 (a) Document Bates numbered APLNDC-WH0000728094-8131, a true and correct  
18 copy of which is attached as Exhibit 1;

19 (b) Document Bates numbered APLNDC-WH0000728132-8141, a true and correct  
20 copy of which is attached as Exhibit 2;

21 (c) Document Bates numbered APLNDC-WH0000728142-8152, a true and correct  
22 copy of which is attached as Exhibit 3;

23 (d) Document Bates numbered APNDC-WH0000728071-8093, a true and correct  
24 copy of which is attached as Exhibit 4; and

25 (e) Documents Bates numbered APNDC-WH0000728062-8070, a true and correct  
26 copy of which is attached as Exhibit 5.

27 3. Apple's Rule 30(b)(6) witness on certain licensing issues was deposed on  
28 February 23, 2012. Fact discovery in this case closed on March 8, 2012. Samsung served its

1 opening and rebuttal damages reports on March 22 and April 16, 2012, respectively. Obviously,  
2 [REDACTED] discussed in my  
3 original declaration – were not available to Samsung or its experts to formulate Samsung's  
4 damages theories or respond to Apple's.

5  
6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct.

8 Executed on May 29, 2012, at Los Angeles, California.

9  
10  
11 

12  
13 \_\_\_\_\_  
14 Christopher E. Price