

# EXHIBIT A

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6  
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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION  
12

13 APPLE INC., a California corporation,

14 Plaintiff,

15 v.

16 SAMSUNG ELECTRONICS CO., LTD., a  
17 Korean corporation; SAMSUNG  
ELECTRONICS AMERICA, INC., a New  
18 York corporation; and SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
19 LLC, a Delaware limited liability company,

20 Defendants.  
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CASE NO. 12-cv-00630-LHK

**APPLE INC.'S FIRST SET OF  
PRELIMINARY INJUNCTION REQUESTS  
FOR PRODUCTION TO DEFENDANTS**

1 APPLE INC. (“Apple”) hereby requests, pursuant to Rules 26 and 34 of the Federal Rules of Civil  
2 Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA,  
3 INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, (“Samsung” or  
4 “Defendants”) respond to Apple’s First Set of Preliminary Injunction Requests for Production. Apple  
5 requests that Defendants produce for inspection and copying the documents and things set forth  
6 below at the offices of Gibson, Dunn & Crutcher, LLP, 1881 Page Mill Road, Palo Alto, CA 94304-  
7 1211, within twenty-one (21) days, or such other time as the parties agree or the Court orders.

### 8 DEFINITIONS

9 The words and phrases used in these Requests shall have the meanings ascribed to them under  
10 the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the  
11 Northern District of California. In addition, the following terms shall have the meanings set forth  
12 below whenever used in any Request.

13 1. “You” and/or “your” mean Defendants and all predecessors, successors, predecessors-  
14 in-interest, successors-in-interest, subsidiaries, divisions, parents, and/or affiliates, past or present,  
15 any companies that have a controlling interest in Defendants, and any current or former employee,  
16 officer, director, principal, agent, consultant, sales representative, or attorney thereof.

17 2. “Samsung Galaxy Nexus” means the Samsung Galaxy Nexus, including but not  
18 limited to all versions released or sold through any wireless carrier or other distributor.

19 3. “Slide to Unlock” means the software, features and functionality that Apple accuses of  
20 infringing U.S. Patent No. 8,046,721 as described in the Declaration of Dr. Ravin Balakrishnan and  
21 that provide the functionality used by the Samsung Galaxy Nexus to unlock the device using a swipe,  
22 slide, or similar touch gesture, including detection of such a gesture and the display of graphical  
23 images or icons indicating that the device is locked, that the device is unlocked, or indicating how a  
24 user may unlock the device, including any directional or instructional cues. Slide to Unlock includes  
25 but is not limited to the “Slide” lock/unlock option described in the Galaxy Nexus User Guide at 11,  
26 99-100 (*available at* [http://static.googleusercontent.com/external\\_content/untrusted\\_dlcp/  
27 www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf](http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf)).

1           4.       “Text Correction” means the software, features and functionality that Apple accuses of  
2 infringing U.S. Patent No. 8,074,172 as described in the Declaration of Dr. Karan Singh and that  
3 provide the functionality relating to editing, correcting, modifying, changing, or replacing typed text  
4 such as but not limited to letters, numbers, and punctuation marks, as well as for the keyboards used  
5 by such functionality, and such use in the Samsung Galaxy Nexus’s email application, Messaging  
6 application, Contacts application or Calendar application. Text Correction includes but is not limited  
7 to the “Enter & Edit Text,” “Correcting Typed Text” or “AutoText” implemented on the Samsung  
8 Galaxy Nexus as described in the Galaxy Nexus User Guide at 53 (*available at*  
9 [http://static.googleusercontent.com/external\\_content/untrusted\\_dlcp/www.google.com/en/us/help/hc/  
10 pdfs/mobile/AndroidUsersGuide-40-en.pdf](http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf)) and at [http://android-developers.blogspot.com/2009/04/  
11 updating-applications-for-on-screen.html](http://android-developers.blogspot.com/2009/04/updating-applications-for-on-screen.html), [http://www.google.com/support/ics/nexus/bin/answer.py?  
12 hl=en&answer=1646288&topic=1646287&ctx=topic](http://www.google.com/support/ics/nexus/bin/answer.py?hl=en&answer=1646288&topic=1646287&ctx=topic), and [http://developer.android.com/reference/  
13 android/text/AutoText.html](http://developer.android.com/reference/android/text/AutoText.html) that permits a user to enter and edit text.

14           5.       “Unified Search” means the software, features and functionality that Apple accuses of  
15 infringing U.S. Patent No. 8,086,604 as described in the Declaration of Dr. Nathaniel Polish and that  
16 provide the functionality used to enable searching of a plurality of resources on the Samsung Galaxy  
17 Nexus, such as contacts, email, messages, search history, and other resources, using a single  
18 interface, for example, the Android Quick Search Box, and the functionality for software,  
19 applications, modules or other sources to be available for search within the Android Quick Search  
20 Box, and the ability to select which software, applications, modules or other sources will be searched  
21 and the functionality or interface to make the software, applications, modules or other sources  
22 searchable through the single user interface. Unified Search includes but is not limited to the  
23 “Google Search” implemented on the Samsung Galaxy Nexus described in the Galaxy Nexus User  
24 Guide at 13 (*available at* [http://static.googleusercontent.com/external\\_content/untrusted\\_dlcp/  
25 www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf](http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf)) and the “Android Quick  
26 Search Box” described at [http://android-developers.blogspot.com/search/label/  
27 Quick%20Search%20Box](http://android-developers.blogspot.com/search/label/Quick%20Search%20Box) and implemented on the Samsung Galaxy Nexus and further includes the  
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1 ability to make software or modules “Searchable items” as described in the Galaxy Nexus User Guide  
2 at 13 and <http://developer.android.com/guide/topics/search/search-dialog.html> or provide  
3 “suggestions [that] appear below the Search box” as described in Galaxy Nexus User Guide at 81.

4 6. “Special Text Detection” means the software, features and functionality that Apple  
5 accuses of infringing U.S. Patent No. 5,946,647 as described in the Declaration of Dr. Todd Mowry  
6 and that provide the functionality relating to the recognition of text within a web page, email  
7 message, text message, SMS message, MMS message or other text displayed to a user of the  
8 Samsung Galaxy Nexus representing an email address, phone number, physical address, date, time,  
9 calendar entry or fax number, including text containing partial representations of those items and the  
10 ability to select the text and perform an action with the text such as placing a telephone call, looking  
11 up an address or storing in the Contacts application. Special Text Selection includes but is not  
12 limited to the ability to “place calls from the Phone app, the People app, or other apps or widgets that  
13 display contact information,” described in the Galaxy Nexus User Guide at 43 (*available at*  
14 [http://static.googleusercontent.com/external\\_content/untrusted\\_dlcp/www.google.com/en/us/help/hc/](http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf)  
15 [pdfs/mobile/AndroidUsersGuide-40-en.pdf](http://static.googleusercontent.com/external_content/untrusted_dlcp/www.google.com/en/us/help/hc/pdfs/mobile/AndroidUsersGuide-40-en.pdf)) and further including the ability to send emails to an  
16 email address displayed in another application such as a the Browser application or Messaging  
17 application or to store information such as a phone number or email address displayed in another  
18 application such as a the Browser application or Messaging application as contact information.

19 7. “Preliminary Injunction Patents” means U.S. Patent Nos. 5,946,647; 6,847,959;  
20 8,046,721; and 8,074,172.

21 8. “Document(s)” has the broadest possible meaning permitted by Federal Rules of Civil  
22 Procedure Rules 26, 33 and 34 and the relevant case law, “Document(s)” also includes all drafts or  
23 non-final versions, alterations, modifications, and amendments to any of the foregoing.

24 9. “Relating” means regarding, referring to, concerning, mentioning, reflecting,  
25 pertaining to, evidencing, involving, describing, discussing, commenting on, embodying, responding  
26 to, supporting, contradicting, containing or constituting (in whole or in part), as the context makes  
27 appropriate.

1  
2 **INSTRUCTIONS**

- 3  
4 1. Each document is to be produced along with all non-identical drafts thereof in their  
5 entirety, without abbreviation or redaction.  
6 2. All documents should be produced as maintained in the ordinary course of business.  
7 3. If you withhold any documents on a claim of privilege, you must provide a statement  
8 of the claim of privilege and all facts relied upon in support of that claim as required by Rule 26(b)(5)  
9 of the Federal Rules of Civil Procedure.  
10 4. Documents responsive to each Request must be produced in full and subject to any  
11 Request being narrowed by the parties' meeting and conferring regarding your corresponding  
12 requests to Plaintiff, if applicable.

13 **REQUESTS FOR PRODUCTION**

14 **REQUEST NO. 1**

15 All Documents relating to the Samsung Galaxy Nexus or other issues raised in Apple's  
16 Motion for Preliminary Injunction in this case that Samsung produced or received from third parties  
17 in *Apple Inc. v. Samsung Electronics Co., Ltd.*, Case No. 11-cv-01846-LHK.

18 **REQUEST NO. 2**

19 All Documents related to the features and functionality that Apple has alleged infringe the  
20 Preliminary Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and  
21 Special Text Detection.  
22

23 **REQUEST NO. 3**

24 Documents sufficient to show the design, development, and implementation of the features  
25 and functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
26 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
27 Detection, including, but not limited to, any documents that discuss or describe Samsung's decision  
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1 to include those features in the Galaxy Nexus.

2 **REQUEST NO. 4**

3 Documents sufficient to show the design, development, and implementation of the keyboards  
4 used by the Samsung Galaxy Nexus to permit users to type or otherwise enter text, including but not  
5 limited to entering letters, numbers, and punctuation marks.  
6

7 **REQUEST NO. 5**

8 Any and all instructions, manuals, guides, or other documentation for the features and  
9 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
10 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
11 Detection.  
12

13 **REQUEST NO. 6**

14 Documents sufficient to identify the individuals who contributed to, oversaw, or were  
15 otherwise involved in the design, development, or implementation of the features and functionality  
16 used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction  
17 Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text Detection.  
18

19 **REQUEST NO. 7**

20 Documents sufficient to identify the date of the first design and use of the features and  
21 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
22 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
23 Detection.  
24

25 **REQUEST NO. 8**

26 Documents sufficient to identify the individuals who contributed to, oversaw, or were  
27 otherwise involved in the design, development, or implementation of the ability to type, enter,  
28 correct, change, or modify text (including letters, numbers, and punctuation marks) in applications,

1 including but not limited to, the email application, Messaging application, Contacts application or  
2 Calendar application.

3 **REQUEST NO. 9**

4 Source code and any other instructions utilized by or implemented on the Samsung Galaxy  
5 Nexus relating to the features and functionality used by the Samsung Galaxy Nexus that Apple has  
6 alleged infringe the Preliminary Injunction Patents, including Slide to Unlock, Text Correction,  
7 Unified Search, and Special Text Detection.  
8

9 **REQUEST NO. 10**

10 Source code and any other instructions utilized by the Samsung Galaxy Nexus relating to the  
11 keyboards to type or otherwise enter text, including but not limited to entering letters, numbers, and  
12 punctuation marks.  
13

14 **REQUEST NO. 11**

15 Source code and any other instructions utilized by the Samsung Galaxy Nexus relating to the  
16 Android Quick Search Box, the functionality for software, applications, modules or other sources to  
17 be available for search within the Android Quick Search Box, the functionality to search software,  
18 applications, modules or other sources from a single user interface or software module, including, but  
19 not limited to the ability to select which software, applications, modules or other sources will be  
20 searched and the functionality or interface to make the software, applications, modules or other  
21 sources searchable through the single user interface or software module.  
22

23 **REQUEST NO. 12**

24 Source code and any other instructions utilized by the Samsung Galaxy Nexus relating to the  
25 typing, entry, correction, change, or modification of text, including letters, numbers, and punctuation  
26 marks, in applications, including but not limited to, the email application, Messaging application,  
27 Contacts application or Calendar application used by the Samsung Galaxy Nexus.  
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1 **REQUEST NO. 13**

2 Source code and any other instructions utilized by or implemented on the Samsung Galaxy  
3 Nexus relating to the recognition of text within a web page, email message, text message, SMS  
4 message, MMS message or other text displayed to a user of the Samsung Galaxy Nexus representing  
5 an email address, phone number, physical address, date, time, calendar entry or fax number,  
6 including text containing partial representations of those items and the ability to select the text and  
7 perform an action with the text such as placing a telephone call, looking up an address or storing in  
8 the Contacts application.  
9

10 **REQUEST NO. 14**

11 All Documents relating to any analysis, review, consideration, evaluation, inspection, tear-  
12 down report, or copying of any Apple product, feature, or functionality, including but not limited to  
13 any comparisons between any Apple product, feature, or functionality and any actual or contemplated  
14 features or functionality Samsung included or considered including with its smartphones, including  
15 but not limited to the Samsung Galaxy Nexus, or tablet computers.  
16

17 **REQUEST NO. 15**

18 All documents relating to any analysis, review, consideration, evaluation, inspection, tear-  
19 down report, or copying of any Apple product relating to the features and functionality used by the  
20 Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction Patents, including  
21 Slide to Unlock, Text Correction, Unified Search, and Special Text Detection.  
22

23 **REQUEST NO. 16**

24 All Documents relating to any analysis, review, consideration, evaluation, or attempts to  
25 design around or otherwise avoid infringement of the Preliminary Injunction Patents.  
26

27 **REQUEST NO. 17**

28 All Documents relating to the design or development of the Samsung Galaxy Nexus that

1 mention or refer to Apple or Apple products, including but not limited to Documents relating to the  
2 design or development of the features and functionality of the Samsung Galaxy Nexus that Apple has  
3 alleged infringe the Preliminary Injunction Patents, including Slide to Unlock, Text Correction,  
4 Unified Search, and Special Text Detection, including communications among or with your  
5 personnel that discuss whether or how to copy or implement any design, feature, or function of an  
6 Apple product.  
7

8 **REQUEST NO. 18**

9 All Documents relating to the design or development of any Samsung smartphone or products  
10 that use or incorporate the Android platform that mention or refer to Apple or Apple products,  
11 including communications among or with your personnel that discuss whether or how to copy or  
12 implement any design, feature, or function of an Apple product. Documents responsive to this  
13 Request include, but are not limited to, Documents related to the redesign of any Samsung product in  
14 light of Apple products.  
15

16 **REQUEST NO. 19**

17 All Documents that comprise, refer, or relate to communications with third parties regarding  
18 the design, development, and implementation of the features and functionality used by the Samsung  
19 Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction Patents, including Slide to  
20 Unlock, Text Correction, Unified Search, and Special Text Detection.  
21

22 **REQUEST NO. 20**

23 All Documents that comprise, refer, or relate to Samsung's discussion of, both internally and  
24 with third-parties, contributions to and efforts related to the design, development and implementation  
25 of the Android platform.  
26

27 **REQUEST NO. 21**

28 All Documents that comprise, refer, or relate to Samsung's discussion of, both internally and

1 with third-parties, contributions to and efforts related to the design, development and implementation  
2 of Android 4.0 Ice Cream Sandwich.

3 **REQUEST NO. 22**

4 All Documents that comprise, refer, or relate to communications with or contributions by  
5 third parties regarding the design, development, and implementation of the Samsung Galaxy Nexus.  
6

7 **REQUEST NO. 23**

8 All Documents that comprise, refer, or relate to communications with or contributions by  
9 third parties regarding the design, development, and implementation of the Samsung smartphones.

10 **REQUEST NO. 24**

11 All Documents that comprise, refer, or relate to communications with or contributions by  
12 third parties regarding the design, development, and implementation of the Samsung products that  
13 use or incorporate the Android platform.  
14

15 **REQUEST NO. 25**

16 All Documents relating to your knowledge of each of the Preliminary Injunction Patents,  
17 including but not limited to when you first became aware of each of the Preliminary Injunction  
18 Patents.

19 **REQUEST NO. 26**

20 All Documents, including source code, prototypes, models and products, that you contend  
21 constitute or relate to prior art to the Preliminary Injunction Patents.  
22

23 **REQUEST NO. 27**

24 All Documents relating to any contention that the Galaxy Nexus does not infringe the asserted  
25 claims of the Preliminary Injunction Patents.

26 **REQUEST NO. 28**

27 All Documents relating to any contention that the asserted claims of the Preliminary  
28

1 Injunction Patents are invalid.

2 **REQUEST NO. 29**

3 All Documents relating to the invalidity, validity, unenforceability, or enforceability of the  
4 Preliminary Injunction Patents, including all Documents relating to any contention that you make that  
5 any of the Preliminary Injunction Patents are invalid or unenforceable.  
6

7 **REQUEST NO. 30**

8 All Documents relating to any issue raised in Apple's Motion for a Preliminary Injunction in  
9 this case.

10 **REQUEST NO. 31**

11 All Documents relating to any position Samsung raises or intends to raise in opposition to  
12 Apple's Motion for Preliminary Injunction in this case.  
13

14 **REQUEST NO. 32**

15 All Documents relied upon or considered by all declarants of Samsung filed in opposition to  
16 Apple's Motion for Preliminary Injunction in this case.

17 **REQUEST NO. 33**

18 All Documents Samsung intends to use for impeachment or examination of all declarants  
19 supporting Apple's Motion for Preliminary Injunction in this case.  
20

21 **REQUEST NO. 34**

22 All Documents Samsung intends to use for impeachment or examination of any person  
23 Samsung will seek to depose in connection with Apple's Motion for Preliminary Injunction in this  
24 case.

25 **REQUEST NO. 35**

26 All Documents considered or relied on to respond to any interrogatory in this case.  
27  
28

1 **REQUEST NO. 36**

2 All Documents relating to any contention that Apple would not be irreparably harmed in the  
3 absence of a preliminary injunction.

4 **REQUEST NO. 37**

5 All Documents relating to any contention that money damages would be adequate to  
6 compensate Apple in this case.

7 **REQUEST NO. 38**

8 All Documents relating to any contention that the public interest would not be served by a  
9 preliminary injunction in this case.

10 **REQUEST NO. 39**

11 All Documents relating to any contention that there is no nexus, relationship, or causal link  
12 between the alleged infringement in this case and the alleged harm to Apple caused by that  
13 infringement.

14 **REQUEST NO. 40**

15 All Documents relating to any impact a preliminary injunction in this case would have on  
16 Defendants.

17 **REQUEST NO. 41**

18 All Documents relating to any contention that any of the features or functionality used by the  
19 Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction Patents, including  
20 Slide to Unlock, Text Correction, Unified Search, and Special Text Detection, are unimportant, do  
21 not drive sales, or are not the basis of consumer demand.

22 **REQUEST NO. 42**

23 All Documents relating to the importance of, or the consumer demand for, the features and  
24 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
25

1 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
2 Detection. Such Documents shall include, but are not limited to, any consumer study, consumer  
3 demand analysis, survey, report, or other analysis.

4 **REQUEST NO. 43**

5 All Documents relating to actual or perceived competition between Apple and Samsung with  
6 regard to the Samsung Galaxy Nexus.

7 **REQUEST NO. 44**

8 All Documents relating to actual or perceived competition between Apple and Samsung with  
9 regard to Samsung smartphones.

10 **REQUEST NO. 45**

11 All Documents relating to actual or perceived competition between Apple and Samsung with  
12 regard to Samsung products that use or incorporate the Android platform.

13 **REQUEST NO. 46**

14 All Documents relating to the competitive impact that the sale of the Samsung Galaxy Nexus  
15 would have or has had on any Apple product.

16 **REQUEST NO. 47**

17 All Documents relating to the competitive impact that the sale of Samsung smartphones  
18 would have or has had on any Apple product.

19 **REQUEST NO. 48**

20 All Documents relating to the competitive impact that the sale of Samsung products that use  
21 or incorporate the Android platform would have or has had on any Apple product.

22 **REQUEST NO. 49**

23 All Documents relating to the competitive impact that the sale of Apple iOS products would  
24 have or has had on any Samsung product.

1 **REQUEST NO. 50**

2 All Documents relating to the actual or potential competitive impact on any Apple product  
3 resulting from the inclusion into any Samsung product of any feature or functionality used by the  
4 Samsung Galaxy Nexus that Apple has alleged infringes the Preliminary Injunction Patents, including  
5 Slide to Unlock, Text Correction, Unified Search, and Special Text Detection.  
6

7 **REQUEST NO. 51**

8 All Documents relating to the importance, or lack thereof, of sales to first-time buyers of the  
9 Samsung Galaxy Nexus or any product with which the Samsung Galaxy Nexus competes, including  
10 any Apple product.  
11

12 **REQUEST NO. 52**

13 All Documents relating to the importance, or lack thereof, to Samsung's smartphone market  
14 share, now and in the future, based on sales to first-time buyers of smartphones.  
15

16 **REQUEST NO. 53**

17 All Documents relating to actual or perceived competition between any Samsung product and  
18 any Apple product containing or embodying any of the features or functionality used by the Samsung  
19 Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction Patents, including Slide to  
20 Unlock, Text Correction, Unified Search, and Special Text Detection.  
21

22 **REQUEST NO. 54**

23 All Documents relating to actual or perceived competition between any smartphone, including  
24 but not limited to any Samsung smartphone, and any Apple product.  
25

26 **REQUEST NO. 55**

27 All Documents relating to actual or perceived competition between any Samsung product that  
28 uses or incorporates the Android platform and any Apple product.  
29

30 **REQUEST NO. 56**

1 Documents sufficient to identify the market for the Samsung Galaxy Nexus.

2 **REQUEST NO. 57**

3 Documents sufficient to identify the market for Samsung products that use or incorporate the  
4 Android platform.

5 **REQUEST NO. 58**

6 Documents sufficient to identify the respective market share of each product that competes  
7 with the Samsung Galaxy Nexus.

8 **REQUEST NO. 59**

9 All Documents relating to Samsung's strategy to acquire market share for its smartphones.

10 **REQUEST NO. 60**

11 All Documents relating to Samsung's strategy to acquire market share for the Samsung  
12 Galaxy Nexus.

13 **REQUEST NO. 61**

14 All Documents related to Samsung's strategy to acquire market share for its tablet computers.

15 **REQUEST NO. 62**

16 All Documents related to Samsung's strategy to acquire market share for Samsung products  
17 that use or incorporate the Android platform.

18 **REQUEST NO. 63**

19 All Documents related to Samsung's strategy to acquire or take market share from Apple iOS  
20 products.

21 **REQUEST NO. 64**

22 Documents sufficient to identify the respective market share of each product that competes  
23 with Apple iOS products.

24



1 **REQUEST NO. 65**

2 Documents sufficient to identify all projections you have reviewed or considered as to what  
3 the respective market share of the Samsung Galaxy Nexus, and each product that competes with the  
4 Samsung Galaxy Nexus, is likely to be at any future point.  
5

6 **REQUEST NO. 66**

7 Documents sufficient to identify all projections you have reviewed or considered as to what  
8 the respective market share of the Samsung Galaxy Nexus, and each product that competes with the  
9 Samsung Galaxy Nexus, is likely to be at any future point.

10 **REQUEST NO. 67**

11 Documents sufficient to identify all projections you have reviewed or considered as to the  
12 respective market share of each Samsung smartphone, and each product that competes with any  
13 Samsung smartphone, is likely to be at any future point.  
14

15 **REQUEST NO. 68**

16 Documents sufficient to identify all projections you have reviewed or considered as to the  
17 respective market share of each Samsung product that uses or incorporates the Android platform, and  
18 each product that competes with any Samsung product that uses or incorporates the Android  
19 platform, is likely to be at any future point.  
20

21 **REQUEST NO. 69**

22 Documents sufficient to show Samsung's business plans and marketing strategies for the  
23 Samsung Galaxy Nexus and for any other Samsung product incorporating any of the features or  
24 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
25 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
26 Detection. Such Documents shall include, but are not limited to, market surveys or studies relating to  
27 buyer loyalty and comparisons between the Samsung Galaxy Nexus and any Apple product.  
28

1 **REQUEST NO. 70**

2 Documents sufficient to show Samsung's business plans and marketing strategies for  
3 Samsung smartphones and products incorporating or using the Android platform. Such Documents  
4 shall include, but are not limited to, market surveys or studies relating to buyer loyalty and  
5 comparisons between the Samsung Galaxy Nexus and any Apple product.  
6

7 **REQUEST NO. 71**

8 Documents sufficient to show Samsung's actual or perceived competitors in the market for  
9 the Samsung Galaxy Nexus and for any other Samsung product incorporating any of the features or  
10 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary  
11 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text  
12 Detection.  
13

14 **REQUEST NO. 72**

15 Documents sufficient to show Samsung's actual or perceived competitors in the market for  
16 the Samsung smartphones or Samsung products that use or incorporate the Android platform.  
17

18 **REQUEST NO. 73**

19 All Documents relating to any customer surveys, studies, analyses or investigations regarding  
20 the Samsung Galaxy Nexus.  
21

22 **REQUEST NO. 74**

23 All Documents relating to any customer surveys, studies, analyses or investigations regarding  
24 Samsung smartphones or Samsung products that use or incorporate the Android platform.  
25

26 **REQUEST NO. 75**

27 All Documents relating to any customer surveys, studies, analyses or investigations regarding  
28 Apple iOS products.  
29

30 **REQUEST NO. 76**

1 All Documents relating to any advertising, promotions, actual or considered related to the  
2 Samsung Galaxy Nexus.

3 **REQUEST NO. 77**

4 All Documents relating to any advertising, promotions, actual or considered related to  
5 Samsung smartphones or Samsung products that use or incorporate the Android platform.  
6

7 **REQUEST NO. 78**

8 Documents sufficient to show Samsung's actual sales and market share for the Samsung  
9 Galaxy Nexus, in terms of both revenue and unit volume, on a monthly, quarterly, and annual basis,  
10 from the time the Samsung Galaxy Nexus was first released, through trial.

11 **REQUEST NO. 79**

12 All Documents created between 2007 and the present relating to Samsung's U.S. market share  
13 for smartphones and tablet computers.  
14

15 **REQUEST NO. 80**

16 Documents sufficient to show Samsung's actual sales and market share for Samsung  
17 smartphones, including but not limited to Documents sufficient to show sales and market share on a  
18 product-by-product basis, in terms of both revenue and unit volume, on a monthly, quarterly, and  
19 annual basis, from 2007 through trial.  
20

21 **REQUEST NO. 81**

22 Documents sufficient to show Samsung's actual sales and market share for Samsung products  
23 that use or incorporate the Android platform, including but not limited to Documents sufficient to  
24 show sales and market share on a product-by-product basis, in terms of both revenue and unit  
25 volume, on a monthly, quarterly, and annual basis, from 2007 through trial.

26 **REQUEST NO. 82**

27 Documents sufficient to show Samsung's projected sales and market share for the  
28

1 Samsung Galaxy Nexus, in terms of both revenue and unit volume, on a monthly, quarterly, and  
2 annual basis, for any period of time for which any such projections were prepared.

3 **REQUEST NO. 83**

4 All Documents that that comprise, refer, or relate to communications with any advertisers  
5 regarding any of the features or functionality used by the Samsung Galaxy Nexus that Apple has  
6 alleged infringe the Preliminary Injunction Patents, including Slide to Unlock, Text Correction,  
7 Unified Search, and Special Text Detection.  
8

9 **REQUEST NO. 84**

10 All Documents considered or relied upon by any expert that Samsung retains in connection  
11 with this case.

12 **REQUEST NO. 85**

13 All Documents that Samsung produced or received from third parties in *Apple Inc. v.*  
14 *Samsung Electronics Co., Ltd.*, Case No. 11-cv-01846-LHK, in response to Apple Inc.'s Requests  
15 For Production of Documents and Things Relating to Apple's Motion For Preliminary Injunction  
16 Request for Production Nos. 1, 206, 214, and 215.  
17

18 **REQUEST NO. 86**

19 All Documents that Samsung produced or received from third parties in *Apple Inc. v.*  
20 *Samsung Electronics Co., Ltd.*, Case No. 11-cv-01846-LHK, in response to the Court's September  
21 28, 2011 Order (Dkt No. 267) and December 22, 2011 Order (Dkt No. 537).  
22

23 **REQUEST NO. 87**

24 All Documents that Samsung produced or received from third parties in *Apple Inc. v.*  
25 *Samsung Electronics Co., Ltd.*, Case No. 11-cv-01846-LHK, discussed, mentioned or referred to in  
26 Apple Inc.'s Motion For Rule 37(B)(2) Sanctions For Samsung's Violation of Two Discovery Orders  
27 (Dkt No. 715).  
28

1 **REQUEST NO. 88**

2 To the extent that Documents responsive to Requests Nos. 85, 86, and 87 do not include  
3 Documents relating to the Samsung Galaxy Nexus, all Documents responsive to Requests Nos. 85,  
4 86, and 87 relating to the Samsung Galaxy Nexus.

5 **REQUEST NO. 89**

6 Documents relating to your analysis, review, consideration, or copying of, or comparison  
7 against, any Apple product or product feature in designing, developing, or implementing any feature  
8 of the Samsung Galaxy Nexus, including but not limited to, (1) Slide To Unlock; (2) Text Correction;  
9 (3) Unified Search; and (4) Special Text Detection.

10 **REQUEST NO. 90**

11 All Documents relating to marketing of the Samsung Galaxy Nexus that discuss or refer  
12 directly or indirectly to Apple or Apple products, including copies of all advertisements or other  
13 promotional materials, marketing plans, market surveys, focus group studies, or other Documents  
14 related to testing of advertisements or advertisement messaging.

15 **REQUEST NO. 91**

16 All Documents relating to any instances of consumer confusion in which Samsung was made  
17 aware that a person confused an Apple product for a Samsung Galaxy Nexus, or a Samsung Galaxy  
18 Nexus for an Apple product.  
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1 Dated: March 6, 2012

GIBSON, DUNN & CRUTCHER LLP

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4 By: H. Mark Lyon  
H. Mark Lyon

5 *Attorneys for Apple Inc.*

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