

EXHIBIT B

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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 Defendant.
27

CASE NO. 12-cv-00630-LHK

**SAMSUNG'S OBJECTIONS AND
RESPONSES TO APPLE'S FIRST SET OF
PRELIMINARY INJUNCTION
REQUESTS FOR PRODUCTION TO
DEFENDANTS**

1 Apple a log of withheld documents at a time agreed to by counsel for the parties. Samsung objects
2 generally to the logging of privileged documents that were created on or after the date of filing of
3 the original Complaint (on February 8, 2012). Samsung will not log privileged documents that
4 were created on or after February 8, 2012.

5 5. Samsung objects to these document requests on the ground and to the extent they
6 are vague and ambiguous. Samsung in its responses will identify any terms it believes are vague
7 and ambiguous and will assume a reasonable meaning for each such term.

8 6. Samsung objects generally to the document requests to the extent they seek
9 information from outside a reasonable time period or from a point other than a reasonable time, or
10 seek information about products outside the United States, on the ground that such information is
11 irrelevant.

12 7. Samsung objects to these document requests to the extent they seek to compel
13 Samsung to generate or create information and/or documents that do not already exist.

14 8. Samsung objects to each document request to the extent it is duplicative or
15 cumulative of another document request or other discovery.

16 9. Samsung objects to each document request to the extent it is compound and
17 comprises discrete subparts resulting in separate document requests.

18 10. Samsung objects generally to the document requests to the extent they seek
19 confidential proprietary or trade secret information of third parties. Samsung will endeavor to
20 work with third parties to obtain their consent, if necessary, before identifying or producing such
21 information and/or documents.

22 11. Samsung objects generally to the document requests on the grounds that they are
23 overly broad, unduly burdensome, and neither relevant nor reasonably calculated to lead to the
24 discovery of admissible evidence.

25 12. Samsung objects to the document requests on the ground that they are overly broad,
26 unduly burdensome and oppressive to the extent they purport to require Samsung to search its
27 facilities and inquire of their employees other than those in its facilities and employees that would
28 reasonably be expected to have responsive information. Samsung's responses are based upon (1)

1 a reasonable search and investigation of facilities and files that could reasonably be expected to
2 contain responsive information, and (2) inquiries of Samsung's employees and/or representatives
3 who could reasonably be expected to possess responsive information.

4 13. Samsung objects to the document requests on the grounds that they seek
5 information already in the possession of Apple, publicly available, or as readily available to Apple
6 as it is to Samsung.

7 14. Samsung objects to the document requests on the grounds and to the extent that
8 they seek legal conclusions or call for expert testimony. Samsung's responses should not be
9 construed to provide legal conclusions.

10 15. Samsung objects to the document requests on the ground that discovery is
11 continuing in this action, and Samsung has not yet completed its factual investigation. The
12 following responses reflect the information reasonably available to Samsung at this time.
13 Samsung reserves its right to amend or supplement these responses and any production of
14 documents as additional discovery and investigation continue, in the event that additional
15 information is disclosed, or in the event of error, inadvertent mistake, or omission.

16 Subject to and without waiving the foregoing General Objections, Samsung responds and
17 further objects as follows:

18 **SPECIFIC OBJECTIONS TO**
19 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

20
21 **REQUEST FOR PRODUCTION NO. 1:**

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

25
26 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:

1 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
2 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
3 any other applicable privilege or immunity; (ii) it seeks documents containing confidential third
4 party information, including information subject to a non-disclosure or other agreement between
5 Samsung and a third party, or documents subject to a protective order; (iii) it seeks documents that
6 are equally or more readily available to Apple than to Samsung; (iv) it is temporally and
7 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
8 and things related to products not at issue in this litigation or the motion for preliminary
9 injunction; (v) it is vague and ambiguous in that it seeks all documents “relating” to the Samsung
10 Galaxy Nexus or “other issues” raised in Apple’s Motion for Preliminary Injunction; (vi) it seeks
11 documents that are not relevant to the claims or defenses of any party and/or not reasonably
12 calculated to lead to the discovery of admissible evidence; and (vii) it is unduly burdensome in
13 that it would require Samsung to produce again documents already deemed produced in this action
14 by virtue of the parties’ Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012.

15

16 **REQUEST FOR PRODUCTION NO. 2:**

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

20

21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it is vague and ambiguous in that it seeks all
27 documents “related to” the “features” and functionality that Apple has alleged infringe the
28 Preliminary Injunction Patents; (iii) it is vague, ambiguous, and unintelligible to the extent it seeks

1 documents relating to any accused features or functionality that are not specifically identified in
2 the request; (iv) it is temporally and substantively overbroad in that it is not limited to any
3 reasonable time period and seeks documents and things related to products not at issue in this
4 litigation or the motion for preliminary injunction; and (v) it seeks documents that are not relevant
5 to the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
6 admissible evidence.

7 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
8 responsive, non-privileged documents in its possession, custody, or control, that can be located
9 based on a reasonable search.

10
11 **REQUEST FOR PRODUCTION NO. 3:**

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

17
18 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
21 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
22 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
23 any other applicable privilege or immunity; (ii) it seeks documents that are equally or more readily
24 available to Apple than to Samsung; (iii) it is vague and ambiguous in that it seeks documents
25 "sufficient to show" the design, development, and implementation of the features and functionality
26 used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary Injunction
27 Patents; (iv) it is vague, ambiguous, and unintelligible to the extent it seeks documents relating to
28 any feature or functionality not specifically identified in the request; (v) it is temporally and

1 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
2 and things related to products not at issue in this litigation or the motion for preliminary
3 injunction; and (vi) it seeks documents that are not relevant to the claims or defenses of any party
4 and/or not reasonably calculated to lead to the discovery of admissible evidence.

5 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
6 responsive, non-privileged documents in its possession, custody, or control, that can be located
7 based on a reasonable search.

8
9 **REQUEST FOR PRODUCTION NO. 4:**

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

13
14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
17 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
18 Apple's Motion for a Preliminary Injunction; (ii) it is vague and ambiguous in that it seeks
19 documents sufficient to show the "design, development, and implementation of the keyboards
20 used by the Samsung Galaxy Nexus;" (iii) it seeks documents that are not relevant to the claims or
21 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
22 evidence; and (iv) it is temporally and substantively overbroad in that it is not limited to any
23 reasonable time period and seeks documents and things related to products not at issue in this
24 litigation or the motion for preliminary injunction.

25
26 **REQUEST FOR PRODUCTION NO. 5:**

27 Any and all instructions, manuals, guides, or other documentation for the features and
28 functionality used by the Samsung Galaxy Nexus that Apple has alleged infringe the Preliminary

1 Injunction Patents, including Slide to Unlock, Text Correction, Unified Search, and Special Text
2 Detection.

3

4 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

5 In addition to its Objections and Responses Common to All Requests for Production,
6 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
7 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
8 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
9 any other applicable privilege or immunity; (ii) it is vague and ambiguous with regard to the terms
10 “manuals,” “guides,” and “documentation;” (iii) it is vague, ambiguous, and unintelligible to the
11 extent it seeks documents relating to any features or functionality that are not specifically
12 identified in the request; (iv) it seeks documents that are equally or more readily available to
13 Apple than to Samsung, including documents and things that are publicly available; (v) it seeks
14 documents that are not relevant to the claims or defenses of any party and/or not reasonably
15 calculated to lead to the discovery of admissible evidence; and (vi) it is temporally and
16 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
17 and things related to products not at issue in this litigation or the motion for preliminary
18 injunction.

19 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
20 responsive, non-privileged documents in its possession, custody, or control, that can be located
21 based on a reasonable search.

22

23 **REQUEST FOR PRODUCTION NO. 6:**

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

28

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks documents that are equally or more readily available to Apple than to Samsung; (ii) it is
5 vague and ambiguous with regard to the terms “design,” “development,” and “implementation;”
6 (iii) it is vague, ambiguous, and unintelligible to the extent it seeks documents relating to any
7 features or functionality that are not specifically identified in the request; and (iv) it seeks
8 documents that are not relevant to the claims or defenses of any party and/or not reasonably
9 calculated to lead to the discovery of admissible evidence.

10 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
11 responsive, non-privileged documents in its possession, custody, or control, that can be located
12 based on a reasonable search.

13
14 **REQUEST FOR PRODUCTION NO. 7:**

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

19
20 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
23 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
24 Apple’s Motion for a Preliminary Injunction; (ii) it seeks documents that are equally or more
25 readily available to Apple than to Samsung, including documents and things that are publicly
26 available; (iii) it is vague and ambiguous with regard to the terms “design,” “use,” “features,” and
27 “functionality”; and (iv) it is vague, ambiguous, and unintelligible to the extent it seeks documents
28 relating to any accused features or functionality that are not specifically identified in the request.

1 **REQUEST FOR PRODUCTION NO. 8:**

2 Documents sufficient to identify the individuals who contributed to, oversaw, or were
3 otherwise involved in the design, development, or implementation of the ability to type, enter,
4 correct, change, or modify text (including letters, numbers, and punctuation marks) in
5 applications, including but not limited to, the email application, Messaging application, Contacts
6 application or Calendar application.

7
8 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
11 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
12 Apple’s Motion for a Preliminary Injunction; (ii) it is vague and ambiguous with regard to the
13 terms “contributed,” “oversaw,” “design,” “development,” “implementation,” and “otherwise
14 involved in;” (iii) it is temporally and substantively overbroad in that it is not limited to any
15 reasonable time period and seeks documents and things related to products not at issue in this
16 litigation; (iv) it seeks documents that are not relevant to the claims or defenses of any party
17 and/or not reasonably calculated to lead to the discovery of admissible evidence; and (v) it seeks
18 documents that are equally or more readily available to Apple than to Samsung.

19
20 **REQUEST FOR PRODUCTION NO. 9:**

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

25
26 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:

1 (i) it seeks documents that are equally or more readily available to Apple than to Samsung; (ii) it
2 seeks the confidential, proprietary and/or trade secret information of third parties, and to the extent
3 it seeks information subject to non-disclosure or other confidentiality agreements between
4 Samsung and a third party; (iii) it is temporally and substantively overbroad in that it is not limited
5 to any reasonable time period and seeks documents and things related to products not at issue in
6 this litigation or the motion for preliminary injunction; (iv) it is vague and ambiguous with regard
7 to the terms “instructions,” “utilized by,” and “implemented on;” and (v) it is vague, ambiguous,
8 and unintelligible to the extent it seeks documents relating to any accused features or functionality
9 that are not specifically identified in the request.

10
11 **REQUEST FOR PRODUCTION NO. 10:**

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

15
16 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
19 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
20 Apple’s Motion for a Preliminary Injunction; (ii) it seeks documents that are equally or more
21 readily available to Apple than to Samsung; (iii) it seeks the confidential, proprietary and/or trade
22 secret information of third parties, and to the extent it seeks information subject to non-disclosure
23 or other confidentiality agreements between Samsung and a third party; (iv) it is temporally and
24 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
25 and things related to products not at issue in this litigation; and (v) it is vague and ambiguous with
26 regard to the terms “instructions,” and “utilized by.”

1 **REQUEST FOR PRODUCTION NO. 11:**

2 Source code and any other instructions utilized by the Samsung Galaxy Nexus relating to
3 the Android Quick Search Box, the functionality for software, applications, modules or other
4 sources to be available for search within the Android Quick Search Box, the functionality to
5 search software, applications, modules or other sources from a single user interface or software
6 module, including, but not limited to the ability to select which software, applications, modules or
7 other sources will be searched and the functionality or interface to make the software, applications,
8 modules or other sources searchable through the single user interface or software module.

9
10 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
13 (i) it seeks documents that are equally or more readily available to Apple than to Samsung; (ii) it
14 seeks the confidential, proprietary and/or trade secret information of third parties, and to the extent
15 it seeks information subject to non-disclosure or other confidentiality agreements between
16 Samsung and a third party; (iii) it is temporally and substantively overbroad in that it is not limited
17 to any reasonable time period and seeks documents and things related to products not at issue in
18 this litigation or the motion for preliminary injunction; and (iv) it is vague, ambiguous, and
19 unintelligible, including with regard to the terms “instructions,” and “utilized by.”

20
21 **REQUEST FOR PRODUCTION NO. 12:**

22 Source code and any other instructions utilized by the Samsung Galaxy Nexus relating to
23 the typing, entry, correction, change, or modification of text, including letters, numbers, and
24 punctuation marks, in applications, including but not limited to, the email application, Messaging
25 application, Contacts application or Calendar application used by the Samsung Galaxy Nexus.

26
27 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

28 In addition to its Objections and Responses Common to All Requests for Production,

1 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
2 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
3 Apple's Motion for a Preliminary Injunction; (ii) it seeks documents that are equally or more
4 readily available to Apple than to Samsung; (iii) it seeks the confidential, proprietary and/or trade
5 secret information of third parties, and to the extent it seeks information subject to non-disclosure
6 or other confidentiality agreements between Samsung and a third party; (iv) it is temporally and
7 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
8 and things related to products not at issue in this litigation; and (v) it is vague and ambiguous with
9 regard to the terms "instructions," and "utilized by."

10
11 **REQUEST FOR PRODUCTION NO. 13:**

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

19
20 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
23 (i) it seeks documents that are equally or more readily available to Apple than to Samsung; (ii) it
24 seeks the confidential, proprietary and/or trade secret information of third parties, and to the extent
25 it seeks information subject to non-disclosure or other confidentiality agreements between
26 Samsung and a third party; (iii) it is temporally and substantively overbroad in that it is not limited
27 to any reasonable time period and seeks documents and things related to products not at issue in
28 this litigation or the motion for preliminary injunction; and (iv) it is vague, ambiguous, and

1 unintelligible, including with regard to the terms “instructions,” and “utilized by.”

2

3 **REQUEST FOR PRODUCTION NO. 14:**

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

9

10 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
13 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
14 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
15 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
16 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
17 temporally and substantively overbroad in that it is not limited to any reasonable time period and
18 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
19 ambiguous with regard to the terms “analysis,” “review,” “consideration,” “evaluation,”
20 “inspection,” “tear-down report,” and “copying;” and (v) it seeks documents that are not relevant
21 to the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
22 admissible evidence.

23

24 **REQUEST FOR PRODUCTION NO. 15:**

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

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
5 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
6 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
7 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
8 temporally and substantively overbroad in that it is not limited to any reasonable time period and
9 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
10 ambiguous with regard to the terms “analysis,” “review,” “consideration,” “evaluation,”
11 “inspection,” “tear-down report,” and “copying;” (v) it is vague, ambiguous, and unintelligible to
12 the extent it seeks documents relating to any accused features or functionality that are not
13 specifically identified in the request; and (vi) it seeks documents that are not relevant to the claims
14 or defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
15 evidence.

16
17 **REQUEST FOR PRODUCTION NO. 16:**

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

20
21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
27 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
28 temporally and substantively overbroad in that it is not limited to any reasonable time period and

1 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
2 ambiguous with regard to the terms “review,” “consideration,” “evaluation,” and “design around”;
3 and (v) it seeks documents that are not relevant to the claims or defenses of any party and/or not
4 reasonably calculated to lead to the discovery of admissible evidence.

5
6 **REQUEST FOR PRODUCTION NO. 17:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
22 temporally and substantively overbroad in that it is not limited to any reasonable time period and
23 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
24 documents that are equally or more readily available to Apple than to Samsung; (v) it is vague and
25 ambiguous with regard to the terms “design,” and “development;” (vi) it is vague, ambiguous, and
26 unintelligible to the extent it seeks documents relating to any accused features or functionality that
27 are not specifically identified in the request; and (vii) it seeks documents that are not relevant to
28 the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of

1 admissible evidence.

2 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
3 responsive, non-privileged documents in its possession, custody, or control, that can be located
4 based on a reasonable search, that relate to Slide to Unlock, Text Correction, Unified Search, and
5 Special Text Detection, as those terms are defined in the request.

6

7 **REQUEST FOR PRODUCTION NO. 18:**

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

14

15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
22 temporally and substantively overbroad in that it is not limited to any reasonable time period and
23 seeks documents and things related to products not at issue in this litigation or the motion for
24 preliminary injunction; (iv) it seeks documents that are not relevant to the claims or defenses of
25 any party and/or not reasonably calculated to lead to the discovery of admissible evidence; and (v)
26 it is vague and ambiguous with regard to the terms “design,” “development” and “relating to.”

27

28

1 **REQUEST FOR PRODUCTION NO. 19:**

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

6
7 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
10 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
11 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
12 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
13 it is not limited to any reasonable time period and seeks documents and things related to products
14 not at issue in this litigation or the motion for preliminary injunction; (iii) it seeks documents
15 containing confidential third party information, including information subject to a non-disclosure
16 or other agreement between Samsung and a third party, or to the extent it seeks documents subject
17 to a protective order; (iv) it is vague and ambiguous with regard to the terms “comprise,” “design,”
18 “development,” “implementation,” “refer,” and “relate to”; and (v) it is vague, ambiguous, and
19 unintelligible to the extent it seeks documents relating to any accused features or functionality that
20 are not specifically identified in the request.

21 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
22 responsive, non-privileged documents in its possession, custody, or control, that can be located
23 based on a reasonable search.

24
25 **REQUEST FOR PRODUCTION NO. 20:**

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

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
5 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
6 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
7 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
8 temporally and substantively overbroad in that it is not limited to any reasonable time period and
9 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
10 documents containing confidential third party information, including information subject to a non-
11 disclosure or other agreement between Samsung and a third party, or to the extent it seeks
12 documents subject to a protective order; (v) it seeks documents that are not relevant to the claims
13 or defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
14 evidence; and (vi) it is vague, ambiguous, and unintelligible, including with regard to the terms
15 “comprise,” “design,” “development,” “implementation,” “refer,” and “relate to.”

16
17 **REQUEST FOR PRODUCTION NO. 21:**

18 All Documents that comprise, refer, or relate to Samsung’s discussion of, both internally
19 and with third-parties, contributions to and efforts related to the design, development and
20 implementation of Android 4.0 Ice Cream Sandwich.

21
22 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
25 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
26 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
27 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
28 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is

1 temporally and substantively overbroad in that it is not limited to any reasonable time period and
2 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
3 documents containing confidential third party information, including information subject to a non-
4 disclosure or other agreement between Samsung and a third party, or to the extent it seeks
5 documents subject to a protective order; (v) it seeks documents that are not relevant to the claims
6 or defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
7 evidence; and (vi) it is vague, ambiguous, and unintelligible, including with regard to the terms
8 “comprise,” “design,” “development,” “implementation,” “refer,” and “relate to.”
9

10 **REQUEST FOR PRODUCTION NO. 22:**

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 Galaxy
13 Nexus.
14

15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
22 temporally and substantively overbroad in that it is not limited to any reasonable time period and
23 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
24 documents that are equally or more readily available to Apple than to Samsung; (v) it seeks
25 documents containing confidential third party information, including information subject to a non-
26 disclosure or other agreement between Samsung and a third party, or to the extent it seeks
27 documents subject to a protective order; (vi) it is vague, ambiguous, and unintelligible, including
28 with regard to the terms “comprise,” “design,” “development,” “implementation,” “refer,” and

1 “relate to;” and (vii) it seeks documents that are not relevant to the claims or defenses of any party
2 and/or not reasonably calculated to lead to the discovery of admissible evidence.

3

4 **REQUEST FOR PRODUCTION NO. 23:**

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

7

8 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
11 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
12 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
13 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
14 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
15 temporally and substantively overbroad in that it is not limited to any reasonable time period and
16 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
17 documents that are equally or more readily available to Apple than to Samsung; (v) it seeks
18 documents containing confidential third party information, including information subject to a non-
19 disclosure or other agreement between Samsung and a third party, or to the extent it seeks
20 documents subject to a protective order; (vi) it is vague, ambiguous, and unintelligible, including
21 with regard to the terms “comprise,” “design,” “development,” “implementation,” “refer,” “relate
22 to,” and “the Samsung smartphones”; and (vii) it seeks documents that are not relevant to the
23 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
24 admissible evidence.

25

26 **REQUEST FOR PRODUCTION NO. 24:**

27 All Documents that comprise, refer, or relate to communications with or contributions by
28 third parties regarding the design, development, and implementation of the Samsung products that

1 use or incorporate the Android platform.
2

3 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
6 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
7 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
8 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
9 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
10 temporally and substantively overbroad in that it is not limited to any reasonable time period and
11 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
12 documents that are equally or more readily available to Apple than to Samsung; (v) it seeks
13 documents containing confidential third party information, including information subject to a non-
14 disclosure or other agreement between Samsung and a third party, or to the extent it seeks
15 documents subject to a protective order; (vi) it is vague, ambiguous, and unintelligible, including
16 with regard to the terms “comprise,” “design,” “development,” “implementation,” “refer,” and
17 “relate to;” and (vii) it seeks documents that are not relevant to the claims or defenses of any party
18 and/or not reasonably calculated to lead to the discovery of admissible evidence.
19

20 **REQUEST FOR PRODUCTION NO. 25:**

21 All Documents relating to your knowledge of each of the Preliminary Injunction Patents,
22 including but not limited to when you first became aware of each of the Preliminary Injunction
23 Patents.
24

25 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
28 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the

1 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
2 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
3 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
4 overly broad and unduly burdensome to the extent that it purports to require Samsung to seek
5 information from thousands of people; (iv) it is temporally and substantively overbroad in that it is
6 not limited to any reasonable time period and seeks documents and things related to products not
7 at issue in this litigation; (v) it seeks documents that are not relevant to the claims or defenses of
8 any party and/or not reasonably calculated to lead to the discovery of admissible evidence; and
9 (vi) it is vague and ambiguous with regard to the term “relating to.”

10
11 **REQUEST FOR PRODUCTION NO. 26:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung’s
21 invalidity contentions, in violation of the Federal Rules of Civil Procedure, this Court’s Local
22 Rules, the Court’s February 8, 2012 Order Setting Initial Case Management Conference and ADR
23 Deadlines, the Court’s February 22, 2012 Order Setting Briefing and Hearing Schedule for
24 Preliminary Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not
25 limited to any reasonable time period and seeks documents and things related to products not at
26 issue in this litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous
27 with regard to the term “relate to.”

1 **REQUEST FOR PRODUCTION NO. 27:**

2 All Documents relating to any contention that the Galaxy Nexus does not infringe the
3 asserted claims of the Preliminary Injunction Patents.
4

5 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
8 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
9 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
10 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's non-
11 infringement contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local
12 Rules, the Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR
13 Deadlines, the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for
14 Preliminary Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not
15 limited to any reasonable time period and seeks documents and things related to products not at
16 issue in this litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous
17 with regard to the term "relate to."
18

19 **REQUEST FOR PRODUCTION NO. 28:**

20 All Documents relating to any contention that the asserted claims of the Preliminary
21 Injunction Patents are invalid.
22

23 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
26 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
27 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
28 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's

1 invalidity contentions, in violation of the Federal Rules of Civil Procedure, this Court’s Local
2 Rules, the Court’s February 8, 2012 Order Setting Initial Case Management Conference and ADR
3 Deadlines, the Court’s February 22, 2012 Order Setting Briefing and Hearing Schedule for
4 Preliminary Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not
5 limited to any reasonable time period and seeks documents and things related to products not at
6 issue in this litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous
7 with regard to the term “relate to.”

8
9 **REQUEST FOR PRODUCTION NO. 29:**

10 All Documents relating to the invalidity, validity, unenforceability, or enforceability of the
11 Preliminary Injunction Patents, including all Documents relating to any contention that you make
12 that any of the Preliminary Injunction Patents are invalid or unenforceable.

13
14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
17 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
18 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
19 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung’s
20 invalidity and unenforceability contentions, in violation of the Federal Rules of Civil Procedure,
21 this Court’s Local Rules, the Court’s February 8, 2012 Order Setting Initial Case Management
22 Conference and ADR Deadlines, the Court’s February 22, 2012 Order Setting Briefing and
23 Hearing Schedule for Preliminary Injunction Motion; (iii) it is temporally and substantively
24 overbroad in that it is not limited to any reasonable time period and seeks documents and things
25 related to products not at issue in this litigation or the motion for preliminary injunction; and (iv) it
26 is vague and ambiguous with regard to the term “relate to.”

1 **REQUEST FOR PRODUCTION NO. 30:**

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

4
5 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
8 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
9 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
10 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
11 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
12 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
13 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
14 Injunction Motion; (iii) it is overly broad and unduly burdensome; and (iv) it is vague, ambiguous,
15 and unintelligible, in that it does not describe with reasonable particularity each item or category
16 of items to be inspected.

17
18 **REQUEST FOR PRODUCTION NO. 31:**

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

21
22 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
25 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
26 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
27 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
28 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the

1 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
2 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
3 Injunction Motion; (iii) it is overly broad and unduly burdensome; (iv) it is vague, ambiguous, and
4 unintelligible, in that it does not describe with reasonable particularity each item or category of
5 items to be inspected; and (v) it calls for speculation.

6
7 **REQUEST FOR PRODUCTION NO. 32:**

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

10
11 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

12 In addition to its Objections and Responses Common to All Requests for Production,
13 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
14 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
15 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
16 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
17 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
18 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
19 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
20 Injunction Motion; (iii) it seeks discovery not permitted under the Court's Agreed Upon Protective
21 Order Regarding Disclosure and Use of Discovery Materials, entered on January 30, 2012 in Civil
22 Action No. 11-cv-01846-LHK and adopted on an interim basis in this action by virtue of the
23 parties' Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012; (iv) it is overly
24 broad and unduly burdensome; (v) it is vague, ambiguous, and unintelligible; and (vi) it calls for
25 speculation.

26
27 **REQUEST FOR PRODUCTION NO. 33:**

28 All Documents Samsung intends to use for impeachment or examination of all declarants

1 supporting Apple's Motion for Preliminary Injunction in this case.

2
3 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
6 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
7 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
8 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
9 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
10 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
11 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
12 Injunction Motion; (iii) the Federal Rules of Civil Procedure do not require the production of
13 impeachment materials; (iv) it is overly broad and unduly burdensome; (v) it is vague, ambiguous,
14 and unintelligible; and (vi) it calls for speculation.

15
16 **REQUEST FOR PRODUCTION NO. 34:**

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

20
21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
27 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
28 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,

1 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
2 Injunction Motion; (iii) the Federal Rules of Civil Procedure do not require the production of
3 impeachment materials; (iv) it is overly broad and unduly burdensome; (v) it is vague, ambiguous,
4 and unintelligible; and (vi) it calls for speculation.

5
6 **REQUEST FOR PRODUCTION NO. 35:**

7 All Documents considered or relied on to respond to any interrogatory in this case.

8
9 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
12 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
13 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
14 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
15 extent it seeks documents not relevant to Apple's Motion for a Preliminary Injunction; (iii) it seeks
16 documents that are not relevant to the claims or defenses of any party and/or not reasonably
17 calculated to lead to the discovery of admissible evidence; (iv) it is overly broad and unduly
18 burdensome in that it is not reasonably limited as to the scope of documents and things it seeks;
19 and (v) it is vague and ambiguous with regard to the term "considered relied on."

20
21 **REQUEST FOR PRODUCTION NO. 36:**

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

24
25 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
28 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the

1 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
2 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
3 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
4 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
5 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
6 Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not limited to any
7 reasonable time period and seeks documents and things related to products not at issue in this
8 litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous with regard
9 to the terms "relating to" and "irreparably harmed."

10
11 **REQUEST FOR PRODUCTION NO. 37:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
21 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
22 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
23 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
24 Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not limited to any
25 reasonable time period and seeks documents and things related to products not at issue in this
26 litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous with regard
27 to the terms "relating to" and "compensate."

1 **REQUEST FOR PRODUCTION NO. 38:**

2 All Documents relating to any contention that the public interest would not be served by a
3 preliminary injunction in this case.
4

5 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 38:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
8 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
9 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
10 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
11 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
12 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
13 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
14 Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not limited to any
15 reasonable time period and seeks documents and things related to products not at issue in this
16 litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous with regard
17 to the terms "relating to" and "public interest."
18

19 **REQUEST FOR PRODUCTION NO. 39:**

20 All Documents relating to any contention that there is no nexus, relationship, or causal link
21 between the alleged infringement in this case and the alleged harm to Apple caused by that
22 infringement.
23

24 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 39:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
27 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
28 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or

1 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
2 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
3 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
4 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
5 Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not limited to any
6 reasonable time period and seeks documents and things related to products not at issue in this
7 litigation or the motion for preliminary injunction; and (iv) it is vague and ambiguous with regard
8 to the terms "relating to," "nexus," "relationship," "causal link," "alleged infringement," and
9 "alleged harm."

10
11 **REQUEST FOR PRODUCTION NO. 40:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 40:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple's Motion for a Preliminary Injunction; (iii) it
22 prematurely seeks disclosure of Samsung's contentions, in violation of the Federal Rules of Civil
23 Procedure, this Court's Local Rules, the Court's February 8, 2012 Order Setting Initial Case
24 Management Conference and ADR Deadlines, the Court's February 22, 2012 Order Setting
25 Briefing and Hearing Schedule for Preliminary Injunction Motion; (iv) it is overly broad and
26 unduly burdensome in that it is not limited to any reasonable time period and seeks documents and
27 things related to products not at issue in this litigation; and (v) it is vague and ambiguous with
28 regard to the terms "relating to" and "impact."

1 **REQUEST FOR PRODUCTION NO. 41:**

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

6
7 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 41:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
10 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
11 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
12 any other applicable privilege or immunity; (ii) it prematurely seeks disclosure of Samsung's
13 contentions, in violation of the Federal Rules of Civil Procedure, this Court's Local Rules, the
14 Court's February 8, 2012 Order Setting Initial Case Management Conference and ADR Deadlines,
15 the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for Preliminary
16 Injunction Motion; (iii) it is temporally and substantively overbroad in that it is not limited to any
17 reasonable time period and seeks documents and things related to products not at issue in this
18 litigation or the motion for preliminary injunction; (iv) it is vague and ambiguous with regard to
19 the terms "relating to," "unimportant," "drive sales," and "basis of consumer demand"; and (v) it
20 is vague, ambiguous, and unintelligible to the extent it seeks documents relating to any accused
21 features or functionality that are not specifically identified in the request.

22
23 **REQUEST FOR PRODUCTION NO. 42:**

24 All Documents relating to the importance of, or the consumer demand for, the features and
25 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. Such Documents shall include, but are not limited to, any consumer study, consumer
28 demand analysis, survey, report, or other analysis.

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 42:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
5 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
6 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
7 it is not limited to any reasonable time period and seeks documents and things related to products
8 not at issue in this litigation or the motion for preliminary injunction; (iii) it is vague and
9 ambiguous with regard to the terms “relating to,” “importance of,” “consumer study,” “consumer
10 demand analysis,” “survey,” “report,” and “other analysis”; (iv) it is vague, ambiguous, and
11 unintelligible to the extent it seeks documents relating to any accused features or functionality that
12 are not specifically identified in the request; and (v) it seeks documents that are equally or more
13 readily available to Apple than to Samsung, including documents and things that are publicly
14 available.

15 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
16 responsive, non-privileged documents in its possession, custody, or control, that can be located
17 based on a reasonable search, that relate to Slide to Unlock, Text Correction, Unified Search, and
18 Special Text Detection, as those terms are defined in the request.

19
20 **REQUEST FOR PRODUCTION NO. 43:**

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

23
24 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 43:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
27 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
28 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or

1 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
2 it is not limited to any reasonable time period and seeks documents and things related to products
3 not at issue in this litigation or the motion for preliminary injunction; (iii) it is vague, ambiguous,
4 and unintelligible, including with regard to the phrase “actual or perceived competition;” (iv) it
5 seeks documents that are equally or more readily available to Apple than to Samsung, including
6 documents and things that are publicly available; and (v) it seeks documents that are not relevant
7 to the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
10 responsive, non-privileged documents in its possession, custody, or control, that can be located
11 based on a reasonable search.

12
13 **REQUEST FOR PRODUCTION NO. 44:**

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

16
17 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 44:**

18 In addition to its Objections and Responses Common to All Requests for Production,
19 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
20 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
21 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
22 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
23 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
24 temporally and substantively overbroad in that it is not limited to any reasonable time period and
25 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
26 ambiguous, and unintelligible, including with regard to the phrase “actual or perceived
27 competition;” (v) it seeks documents that are equally or more readily available to Apple than to
28 Samsung, including documents and things that are publicly available; and (vi) it seeks documents

1 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
2 to the discovery of admissible evidence.

3

4 **REQUEST FOR PRODUCTION NO. 45:**

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

7

8 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 45:**

9 In addition to its Objections and Responses Common to All Requests for Production,
10 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
11 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
12 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
13 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
14 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
15 temporally and substantively overbroad in that it is not limited to any reasonable time period and
16 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
17 ambiguous, and unintelligible, including with regard to the phrase “actual or perceived
18 competition;” (v) it seeks documents that are equally or more readily available to Apple than to
19 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
20 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
21 to the discovery of admissible evidence.

22

23 **REQUEST FOR PRODUCTION NO. 46:**

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

26

27 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 46:**

28 In addition to its Objections and Responses Common to All Requests for Production,

1 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
2 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
3 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
4 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
5 it is not limited to any reasonable time period and seeks documents and things related to products
6 not at issue in this litigation or the motion for preliminary injunction; (iii) it is vague and
7 ambiguous with regard to the phrase “competitive impact;” (iv) it seeks documents that are equally
8 or more readily available to Apple than to Samsung, including documents and things that are
9 publicly available; and (v) it seeks documents that are not relevant to the claims or defenses of any
10 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

11 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
12 responsive, non-privileged documents in its possession, custody, or control, that can be located
13 based on a reasonable search.

14
15 **REQUEST FOR PRODUCTION NO. 47:**

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

18
19 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 47:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
22 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
23 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
24 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
25 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
26 temporally and substantively overbroad in that it is not limited to any reasonable time period and
27 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
28 ambiguous with regard to the phrase “competitive impact;” (v) it seeks documents that are equally

1 or more readily available to Apple than to Samsung, including documents and things that are
2 publicly available; and (vi) it seeks documents that are not relevant to the claims or defenses of
3 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.
4

5 **REQUEST FOR PRODUCTION NO. 48:**

6 All Documents relating to the competitive impact that the sale of Samsung products that
7 use or incorporate the Android platform would have or has had on any Apple product.
8

9 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 48:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
12 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
13 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
14 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
15 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
16 temporally and substantively overbroad in that it is not limited to any reasonable time period and
17 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
18 ambiguous with regard to the phrase “competitive impact;” (v) it seeks documents that are equally
19 or more readily available to Apple than to Samsung, including documents and things that are
20 publicly available; and (vi) it seeks documents that are not relevant to the claims or defenses of
21 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.
22

23 **REQUEST FOR PRODUCTION NO. 49:**

24 All Documents relating to the competitive impact that the sale of Apple iOS products
25 would have or has had on any Samsung product.
26

27 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 49:**

28 In addition to its Objections and Responses Common to All Requests for Production,

1 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
2 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
3 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
4 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
5 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
6 temporally and substantively overbroad in that it is not limited to any reasonable time period and
7 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
8 ambiguous with regard to the phrase “competitive impact;” (v) it seeks documents that are equally
9 or more readily available to Apple than to Samsung, including documents and things that are
10 publicly available; and (vi) it seeks documents that are not relevant to the claims or defenses of
11 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.

12

13 **REQUEST FOR PRODUCTION NO. 50:**

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

18

19 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 50:**

20 In addition to its Objections and Responses Common to All Requests for Production,
21 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
22 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
23 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
24 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
25 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
26 temporally and substantively overbroad in that it is not limited to any reasonable time period and
27 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
28 ambiguous with regard to the phrase “actual or potential competitive impact;” (v) it is vague,

1 ambiguous, and unintelligible to the extent it seeks documents relating to any accused features or
2 functionality that are not specifically identified in the request; (vi) it seeks documents that are
3 equally or more readily available to Apple than to Samsung, including documents and things that
4 are publicly available; and (vii) it seeks documents that are not relevant to the claims or defenses
5 of any party and/or not reasonably calculated to lead to the discovery of admissible evidence.

6
7 **REQUEST FOR PRODUCTION NO. 51:**

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

11
12 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 51:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
15 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
16 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
17 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
18 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
19 temporally and substantively overbroad in that it is not limited to any reasonable time period and
20 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
21 ambiguous, and unintelligible, including with regard to the terms “importance” and “first-time
22 buyers”; (v) it seeks documents that are equally or more readily available to Apple than to
23 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
24 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
25 to the discovery of admissible evidence.

26
27 **REQUEST FOR PRODUCTION NO. 52:**

28 All Documents relating to the importance, or lack thereof, to Samsung’s smartphone

1 market share, now and in the future, based on sales to first-time buyers of smartphones.

2
3 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 52:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
6 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
7 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
8 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
9 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
10 temporally and substantively overbroad in that it is not limited to any reasonable time period and
11 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
12 ambiguous, and unintelligible, including with regard to the terms “importance” and “first-time
13 buyers”; (v) it seeks documents that are equally or more readily available to Apple than to
14 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
15 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
16 to the discovery of admissible evidence.

17
18 **REQUEST FOR PRODUCTION NO. 53:**

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

23
24 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 53:**

25 In addition to its Objections and Responses Common to All Requests for Production,
26 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
27 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
28 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or

1 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
2 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
3 temporally and substantively overbroad in that it is not limited to any reasonable time period and
4 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
5 ambiguous, and unintelligible, including with regard to the phrase “actual or perceived
6 competition;” (v) it seeks documents that are equally or more readily available to Apple than to
7 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
8 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
9 to the discovery of admissible evidence.

10
11 **REQUEST FOR PRODUCTION NO. 54:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 54:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
22 temporally and substantively overbroad in that it is not limited to any reasonable time period and
23 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
24 ambiguous, and unintelligible, including with regard to the phrase “actual or perceived
25 competition;” (v) it seeks documents that are equally or more readily available to Apple than to
26 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
27 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
28 to the discovery of admissible evidence.

1 **REQUEST FOR PRODUCTION NO. 55:**

2 All Documents relating to actual or perceived competition between any Samsung product
3 that uses or incorporates the Android platform and any Apple product.
4

5 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 55:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
8 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
9 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
10 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
11 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
12 temporally and substantively overbroad in that it is not limited to any reasonable time period and
13 seeks documents and things related to products not at issue in this litigation; (iv) it is vague,
14 ambiguous, and unintelligible, including with regard to the phrase “actual or perceived
15 competition;” (v) it seeks documents that are equally or more readily available to Apple than to
16 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
17 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
18 to the discovery of admissible evidence.
19

20 **REQUEST FOR PRODUCTION NO. 56:**

21 Documents sufficient to identify the market for the Samsung Galaxy Nexus.
22

23 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 56:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
26 (i) it is vague and ambiguous with regard to the term “market”; and (ii) it seeks documents that are
27 equally or more readily available to Apple than to Samsung, including documents and things that
28 are publicly available.

1 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
2 responsive, non-privileged documents in its possession, custody, or control, that can be located
3 based on a reasonable search.
4

5 **REQUEST FOR PRODUCTION NO. 57:**

6 Documents sufficient to identify the market for Samsung products that use or incorporate
7 the Android platform.
8

9 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 57:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
12 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
13 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
14 that it is not limited to any reasonable time period and seeks documents and things related to
15 products not at issue in this litigation; (iii) it is vague and ambiguous with regard to the term
16 “market”; (iv) it seeks documents that are equally or more readily available to Apple than to
17 Samsung, including documents and things that are publicly available; and (v) it seeks documents
18 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
19 to the discovery of admissible evidence.
20

21 **REQUEST FOR PRODUCTION NO. 58:**

22 Documents sufficient to identify the respective market share of each product that competes
23 with the Samsung Galaxy Nexus.
24

25 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 58:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
28 (i) it is vague and ambiguous with regard to the term “market share”; (ii) it seeks documents that

1 are equally or more readily available to Apple than to Samsung, including documents and things
2 that are publicly available; and (iii) it seeks documents that are not relevant to the claims or
3 defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
4 evidence.

5 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
6 responsive, non-privileged documents in its possession, custody, or control, that can be located
7 based on a reasonable search.

8
9 **REQUEST FOR PRODUCTION NO. 59:**

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

11
12 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 59:**

13 In addition to its Objections and Responses Common to All Requests for Production,
14 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
15 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
16 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
17 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
18 extent it seeks documents not relevant to Apple's Motion for a Preliminary Injunction; (iii) it is
19 temporally and substantively overbroad in that it is not limited to any reasonable time period and
20 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
21 ambiguous with regard to the terms "strategy," and "market share;" and (v) it seeks documents
22 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
23 to the discovery of admissible evidence.

24
25 **REQUEST FOR PRODUCTION NO. 60:**

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

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 60:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
5 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
6 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
7 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
8 temporally and substantively overbroad in that it is not limited to any reasonable time period and
9 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
10 ambiguous with regard to the terms “strategy,” and “market share;” and (v) it seeks documents
11 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
12 to the discovery of admissible evidence.

13 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
14 responsive, non-privileged documents in its possession, custody, or control, that can be located
15 based on a reasonable search.

16
17 **REQUEST FOR PRODUCTION NO. 61:**

18 All Documents related to Samsung’s strategy to acquire market share for its tablet
19 computers.

20
21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 61:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
27 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
28 temporally and substantively overbroad in that it is not limited to any reasonable time period and

1 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
2 ambiguous with regard to the terms “strategy,” and “market share;” and (v) it seeks documents
3 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
4 to the discovery of admissible evidence.

5
6 **REQUEST FOR PRODUCTION NO. 62:**

7 All Documents related to Samsung’s strategy to acquire market share for Samsung
8 products that use or incorporate the Android platform.

9
10 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 62:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
13 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
14 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
15 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
16 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
17 temporally and substantively overbroad in that it is not limited to any reasonable time period and
18 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
19 ambiguous with regard to the terms “strategy,” and “market share;” and (v) it seeks documents
20 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
21 to the discovery of admissible evidence.

22
23 **REQUEST FOR PRODUCTION NO. 63:**

24 All Documents related to Samsung’s strategy to acquire or take market share from Apple
25 iOS products.

26
27 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 63:**

28 In addition to its Objections and Responses Common to All Requests for Production,

1 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
2 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
3 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
4 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
5 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
6 temporally and substantively overbroad in that it is not limited to any reasonable time period and
7 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
8 ambiguous with regard to the terms “strategy,” and “market share;” and (v) it seeks documents
9 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
10 to the discovery of admissible evidence.

11

12 **REQUEST FOR PRODUCTION NO. 64:**

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

15

16 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 64:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
19 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
20 Apple’s Motion for a Preliminary Injunction; (ii) it is vague and ambiguous with regard to the
21 terms “market share,” and “competes;” (iii) it seeks documents that are not relevant to the claims
22 or defenses of any party and/or not reasonably calculated to lead to the discovery of admissible
23 evidence; (iv) it seeks documents that are equally or more readily available to Apple than to
24 Samsung, including documents and things that are publicly available; and (v) it is temporally and
25 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
26 and things related to products not at issue in this litigation.

27

28

1 **REQUEST FOR PRODUCTION NO. 65:**

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

6 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 65:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
9 (i) it is vague and ambiguous, including with regard to the terms “projections,” “market share,”
10 and “competes;” (ii) it is temporally and substantively overbroad in that it is not limited to any
11 reasonable time period and seeks documents and things related to products not at issue in this
12 litigation or the motion for preliminary injunction; (iii) it is overly broad and unduly burdensome
13 to the extent that it purports to require Samsung to seek information from thousands of people; and
14 (iv) it seeks documents that are not relevant to the claims or defenses of any party and/or not
15 reasonably calculated to lead to the discovery of admissible evidence.

16 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
17 responsive, non-privileged documents in its possession, custody, or control, that can be located
18 based on a reasonable search.
19

20 **REQUEST FOR PRODUCTION NO. 66:**

21 Documents sufficient to identify all projections you have reviewed or considered as to
22 what the respective market share of the Samsung Galaxy Nexus, and each product that competes
23 with the Samsung Galaxy Nexus, is likely to be at any future point.
24

25 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 66:**

26 In addition to its Objections and Responses Common to All Requests for Production,
27 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
28 (i) it is vague and ambiguous, including with regard to the terms “projections,” “market share,”

1 and “competes;” (ii) it is temporally and substantively overbroad in that it is not limited to any
2 reasonable time period and seeks documents and things related to products not at issue in this
3 litigation or the motion for preliminary injunction; (iii) it is overly broad and unduly burdensome
4 to the extent that it purports to require Samsung to seek information from thousands of people; and
5 (iv) it seeks documents that are not relevant to the claims or defenses of any party and/or not
6 reasonably calculated to lead to the discovery of admissible evidence.

7 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
8 responsive, non-privileged documents in its possession, custody, or control, that can be located
9 based on a reasonable search.

10
11 **REQUEST FOR PRODUCTION NO. 67:**

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

15
16 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 67:**

17 In addition to its Objections and Responses Common to All Requests for Production,
18 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
19 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
20 Apple’s Motion for a Preliminary Injunction; (ii) it is vague and ambiguous, including with regard
21 to the terms “projections,” “market share,” and “competes;” (iii) it is temporally and substantively
22 overbroad in that it is not limited to any reasonable time period and seeks documents and things
23 related to products not at issue in this litigation; (iv) it is overly broad and unduly burdensome to
24 the extent that it purports to require Samsung to seek information from thousands of people; and
25 (v) it seeks documents that are not relevant to the claims or defenses of any party and/or not
26 reasonably calculated to lead to the discovery of admissible evidence.

1 **REQUEST FOR PRODUCTION NO. 68:**

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

6
7 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 68:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
10 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
11 Apple’s Motion for a Preliminary Injunction; (ii) it is vague and ambiguous, including with regard
12 to the terms “projections,” “market share,” and “competes;” (iii) it is temporally and substantively
13 overbroad in that it is not limited to any reasonable time period and seeks documents and things
14 related to products not at issue in this litigation; (iv) it is overly broad and unduly burdensome to
15 the extent that it purports to require Samsung to seek information from thousands of people; and
16 (v) it seeks documents that are not relevant to the claims or defenses of any party and/or not
17 reasonably calculated to lead to the discovery of admissible evidence.

18
19 **REQUEST FOR PRODUCTION NO. 69:**

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

27
28

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 69:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
5 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
6 that it is not limited to any reasonable time period and seeks documents and things related to
7 products not at issue in this litigation; (iii) it is vague and ambiguous with regard to the terms
8 “business plans,” “marketing strategies,” “market surveys,” “studies,” and “buyer loyalty;” (iv) it
9 is vague, ambiguous, and unintelligible to the extent it seeks documents relating to any accused
10 features or functionality that are not specifically identified in the request; and (v) it seeks
11 documents that are not relevant to the claims or defenses of any party and/or not reasonably
12 calculated to lead to the discovery of admissible evidence.

13 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
14 responsive, non-privileged business plans and marketing strategies for the Samsung Galaxy Nexus
15 in its possession, custody, or control, that can be located based on a reasonable search.

16
17 **REQUEST FOR PRODUCTION NO. 70:**

18 Documents sufficient to show Samsung’s business plans and marketing strategies for
19 Samsung smartphones and products incorporating or using the Android platform. Such
20 Documents shall include, but are not limited to, market surveys or studies relating to buyer loyalty
21 and comparisons between the Samsung Galaxy Nexus and any Apple product.

22
23 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 70:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
26 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
27 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
28 that it is not limited to any reasonable time period and seeks documents and things related to

1 products not at issue in this litigation; (iii) it is vague and ambiguous with regard to the terms
2 “business plans,” “marketing strategies,” “market surveys,” “studies,” and “buyer loyalty;” and
3 (iv) it seeks documents that are not relevant to the claims or defenses of any party and/or not
4 reasonably calculated to lead to the discovery of admissible evidence.

5
6 **REQUEST FOR PRODUCTION NO. 71:**

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

12
13 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 71:**

14 In addition to its Objections and Responses Common to All Requests for Production,
15 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
16 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
17 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
18 that it is not limited to any reasonable time period and seeks documents and things related to
19 products not at issue in this litigation; (iii) it is vague, ambiguous, and unintelligible, including
20 with regard to the phrase “actual or perceived competitors;” (iv) it seeks documents that are
21 equally or more readily available to Apple than to Samsung, including documents and things that
22 are publicly available; and (v) it seeks documents that are not relevant to the claims or defenses of
23 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.

24 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
25 responsive, non-privileged documents regarding the Samsung Galaxy Nexus in its possession,
26 custody, or control, that can be located based on a reasonable search.

1 **REQUEST FOR PRODUCTION NO. 72:**

2 Documents sufficient to show Samsung’s actual or perceived competitors in the market for
3 the Samsung smartphones or Samsung products that use or incorporate the Android platform.
4

5 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 72:**

6 In addition to its Objections and Responses Common to All Requests for Production,
7 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
8 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
9 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
10 that it is not limited to any reasonable time period and seeks documents and things related to
11 products not at issue in this litigation; (iii) it is vague, ambiguous, and unintelligible, including
12 with regard to the phrase “actual or perceived competitors;” (iv) it seeks documents that are
13 equally or more readily available to Apple than to Samsung, including documents and things that
14 are publicly available; and (v) it seeks documents that are not relevant to the claims or defenses of
15 any party and/or not reasonably calculated to lead to the discovery of admissible evidence.
16

17 **REQUEST FOR PRODUCTION NO. 73:**

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

21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 73:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
27 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
28 temporally and substantively overbroad in that it is not limited to any reasonable time period and

1 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
2 ambiguous with regard to the terms “customer surveys,” “studies,” “analyses,” and
3 “investigations;” and (v) it seeks documents that are not relevant to the claims or defenses of any
4 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

5 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
6 responsive, non-privileged documents in its possession, custody, or control, that can be located
7 based on a reasonable search.

8
9 **REQUEST FOR PRODUCTION NO. 74:**

10 All Documents relating to any customer surveys, studies, analyses or investigations
11 regarding Samsung smartphones or Samsung products that use or incorporate the Android
12 platform.

13
14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 74:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
17 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
18 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
19 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
20 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
21 temporally and substantively overbroad in that it is not limited to any reasonable time period and
22 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
23 ambiguous with regard to the terms “customer surveys,” “studies,” “analyses,” and
24 “investigations;” and (v) it seeks documents that are not relevant to the claims or defenses of any
25 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

26
27 **REQUEST FOR PRODUCTION NO. 75:**

28 All Documents relating to any customer surveys, studies, analyses or investigations

1 regarding Apple iOS products.
2

3 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 75:**

4 In addition to its Objections and Responses Common to All Requests for Production,
5 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
6 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
7 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
8 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
9 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
10 temporally and substantively overbroad in that it is not limited to any reasonable time period and
11 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
12 documents that are equally or more readily available to Apple than to Samsung, including
13 documents and things that are publicly available; (v) it is vague and ambiguous with regard to the
14 terms “customer surveys,” “studies,” “analyses,” and “investigations;” and (vi) it seeks documents
15 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
16 to the discovery of admissible evidence.

17

18 **REQUEST FOR PRODUCTION NO. 76:**

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

21

22 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 76:**

23 In addition to its Objections and Responses Common to All Requests for Production,
24 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
25 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
26 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
27 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
28 it is not limited to any reasonable time period and seeks documents and things related to products

1 not at issue in this litigation or the motion for preliminary injunction; (iii) it seeks documents that
2 are equally or more readily available to Apple than to Samsung, including documents and things
3 that are publicly available; (iv) it is vague and ambiguous with regard to the terms “advertising,”
4 and “promotions;” and (v) it seeks documents that are not relevant to the claims or defenses of any
5 party and/or not reasonably calculated to lead to the discovery of admissible evidence.

6 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
7 responsive, non-privileged documents in its possession, custody, or control, that can be located
8 based on a reasonable search.

9
10 **REQUEST FOR PRODUCTION NO. 77:**

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

13
14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 77:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
17 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
18 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
19 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
20 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
21 temporally and substantively overbroad in that it is not limited to any reasonable time period and
22 seeks documents and things related to products not at issue in this litigation; (iv) it seeks
23 documents that are equally or more readily available to Apple than to Samsung, including
24 documents and things that are publicly available; (v) it is vague and ambiguous with regard to the
25 terms “advertising,” and “promotions;” and (vi) it seeks documents that are not relevant to the
26 claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
27 admissible evidence.

1 **REQUEST FOR PRODUCTION NO. 78:**

2 Documents sufficient to show Samsung's actual sales and market share for the Samsung
3 Galaxy Nexus, in terms of both revenue and unit volume, on a monthly, quarterly, and annual
4 basis, from the time the Samsung Galaxy Nexus was first released, through trial.
5

6 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 78:**

7 In addition to its Objections and Responses Common to All Requests for Production,
8 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
9 (i) it is temporally and substantively overbroad in that it is not limited to any reasonable time
10 period and seeks documents and things related to products not at issue in this litigation or the
11 motion for preliminary injunction; (ii) it is unduly burdensome to the extent it purports to require
12 Samsung to produce information in a format different from how it is kept in the ordinary course of
13 business; (iii) it is vague and ambiguous with regard to the terms "actual sales," and "market
14 share;" (iv) it seeks documents that are equally or more readily available to Apple than to
15 Samsung, including documents and things that are publicly available; and (v) it seeks documents
16 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
17 to the discovery of admissible evidence.

18 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
19 responsive, non-privileged documents in its possession, custody, or control, that can be located
20 based on a reasonable search.
21

22 **REQUEST FOR PRODUCTION NO. 79:**

23 All Documents created between 2007 and the present relating to Samsung's U.S. market
24 share for smartphones and tablet computers.
25

26 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 79:**

27 In addition to its Objections and Responses Common to All Requests for Production,
28 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:

1 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
2 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
3 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
4 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
5 vague and ambiguous with regard to the term “market share;” (iv) it is temporally and
6 substantively overbroad in that it is not limited to any reasonable time period and seeks documents
7 and things related to products not at issue in this litigation; (v) it seeks documents that are not
8 relevant to the claims or defenses of any party and/or not reasonably calculated to lead to the
9 discovery of admissible evidence; and (vi) it seeks documents that are equally or more readily
10 available to Apple than to Samsung, including documents and things that are publicly available.

11

12 **REQUEST FOR PRODUCTION NO. 80:**

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

17

18 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 80:**

19 In addition to its Objections and Responses Common to All Requests for Production,
20 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
21 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
22 Apple’s Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
23 that it is not limited to any reasonable time period and seeks documents and things related to
24 products not at issue in this litigation; (iii) it is unduly burdensome to the extent it purports to
25 require Samsung to produce information in a format different from how it is kept in the ordinary
26 course of business; (iv) it is vague and ambiguous with regard to the terms “actual sales,” and
27 “market share;” (v) it seeks documents that are equally or more readily available to Apple than to
28 Samsung, including documents and things that are publicly available; and (vi) it seeks documents

1 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
2 to the discovery of admissible evidence.

3
4 **REQUEST FOR PRODUCTION NO. 81:**

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

9
10 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

11 In addition to its Objections and Responses Common to All Requests for Production,
12 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
13 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
14 Apple's Motion for a Preliminary Injunction; (ii) it is temporally and substantively overbroad in
15 that it is not limited to any reasonable time period and seeks documents and things related to
16 products not at issue in this litigation; (iii) it is unduly burdensome to the extent it purports to
17 require Samsung to produce information in a format different from how it is kept in the ordinary
18 course of business; (iv) it is vague and ambiguous with regard to the terms "actual sales," and
19 "market share;" (v) it seeks documents that are equally or more readily available to Apple than to
20 Samsung, including documents and things that are publicly available; and (vi) it seeks documents
21 that are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead
22 to the discovery of admissible evidence.

23
24 **REQUEST FOR PRODUCTION NO. 82:**

25 Documents sufficient to show Samsung's projected sales and market share for the
26 Samsung Galaxy Nexus, in terms of both revenue and unit volume, on a monthly, quarterly, and
27 annual basis, for any period of time for which any such projections were prepared.

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it is temporally and substantively overbroad in that it is not limited to any reasonable time
5 period and seeks documents and things related to products not at issue in this litigation or the
6 motion for preliminary injunction; (ii) it is unduly burdensome to the extent it purports to require
7 Samsung to produce information in a format different from how it is kept in the ordinary course of
8 business; (iii) it is vague and ambiguous with regard to the terms “projected sales,” and “market
9 share;” and (iv) it seeks documents that are not relevant to the claims or defenses of any party
10 and/or not reasonably calculated to lead to the discovery of admissible evidence.

11 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
12 responsive, non-privileged documents in its possession, custody, or control, that can be located
13 based on a reasonable search.

14
15 **REQUEST FOR PRODUCTION NO. 83:**

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

20
21 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

22 In addition to its Objections and Responses Common to All Requests for Production,
23 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
24 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
25 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
26 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
27 it is not limited to any reasonable time period and seeks documents and things related to products
28 not at issue in this litigation or the motion for preliminary injunction; (iii) it seeks documents that

1 are not relevant to the claims or defenses of any party and/or not reasonably calculated to lead to
2 the discovery of admissible evidence; (iv) it is vague and ambiguous with regard to the terms
3 “comprise,” “refer,” and “relate to”; and (v) it is vague, ambiguous, and unintelligible to the extent
4 it seeks documents relating to any accused features or functionality that are not specifically
5 identified in the request.

6 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
7 responsive, non-privileged documents in its possession, custody, or control, that can be located
8 based on a reasonable search, that relate to Slide to Unlock, Text Correction, Unified Search, and
9 Special Text Detection, as those terms are defined in the request.

10
11 **REQUEST FOR PRODUCTION NO. 84:**

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

14
15 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 84:**

16 In addition to its Objections and Responses Common to All Requests for Production,
17 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
18 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
19 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
20 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
21 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it seeks
22 discovery not permitted under the Court’s Agreed Upon Protective Order Regarding Disclosure
23 and Use of Discovery Materials, entered on January 30, 2012 in Civil Action No. 11-cv-01846-
24 LHK and adopted on an interim basis in this action by virtue of the parties’ Stipulation and
25 [Proposed] Order Re Discovery, filed March 22, 2012; (iv) it is vague and ambiguous with regard
26 to the terms “considered” and “relied upon;” and (v) it is temporally and substantively overbroad
27 in that it is not limited to any reasonable time period and seeks documents and things related to
28 products not at issue in this litigation.

1 **REQUEST FOR PRODUCTION NO. 85:**

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

6
7 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 85:**

8 In addition to its Objections and Responses Common to All Requests for Production,
9 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
10 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
11 Apple's Motion for a Preliminary Injunction; (ii) it is unduly burdensome in that it would require
12 Samsung to produce again documents already deemed produced in this action by virtue of the
13 parties' Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012; (iii) it seeks
14 documents containing confidential third party information, including information subject to a non-
15 disclosure or other agreement between Samsung and a third party, or documents subject to a
16 protective order; (iv) it seeks documents that are equally or more readily available to Apple than to
17 Samsung; (v) it is temporally and substantively overbroad in that it is not limited to any reasonable
18 time period and seeks documents and things related to products not at issue in this litigation; and
19 (vi) it seeks documents that are not relevant to the claims or defenses of any party and/or not
20 reasonably calculated to lead to the discovery of admissible evidence.

21
22 **REQUEST FOR PRODUCTION NO. 86:**

23 All Documents that Samsung produced or received from third parties in Apple Inc. v.
24 Samsung Electronics Co., Ltd., Case No. 11-cv-01846-LHK, in response to the Court's September
25 28, 2011 Order (Dkt No. 267) and December 22, 2011 Order (Dkt No. 537).

26
27 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 86:**

28 In addition to its Objections and Responses Common to All Requests for Production,

1 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
2 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
3 Apple's Motion for a Preliminary Injunction; (ii) it is unduly burdensome in that it would require
4 Samsung to produce again documents already deemed produced in this action by virtue of the
5 parties' Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012; (iii) it seeks
6 documents containing confidential third party information, including information subject to a non-
7 disclosure or other agreement between Samsung and a third party, or documents subject to a
8 protective order; (iv) it seeks documents that are equally or more readily available to Apple than to
9 Samsung; (v) it is temporally and substantively overbroad in that it is not limited to any reasonable
10 time period and seeks documents and things related to products not at issue in this litigation; and
11 (vi) it seeks documents that are not relevant to the claims or defenses of any party and/or not
12 reasonably calculated to lead to the discovery of admissible evidence.

13

14 **REQUEST FOR PRODUCTION NO. 87:**

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

19

20 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 87:**

21 In addition to its Objections and Responses Common to All Requests for Production,
22 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
23 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
24 Apple's Motion for a Preliminary Injunction; (ii) it is unduly burdensome in that it would require
25 Samsung to produce again documents already deemed produced in this action by virtue of the
26 parties' Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012; (iii) it seeks
27 documents containing confidential third party information, including information subject to a non-
28 disclosure or other agreement between Samsung and a third party, or documents subject to a

1 protective order; (iv) it seeks documents that are equally or more readily available to Apple than to
2 Samsung; (v) it is temporally and substantively overbroad in that it is not limited to any reasonable
3 time period and seeks documents and things related to products not at issue in this litigation; (vi) it
4 is vague, ambiguous, and unintelligible, in that it does not describe with reasonable particularity
5 each item or category of items to be inspected; and (vii) it seeks documents that are not relevant to
6 the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
7 admissible evidence.

8
9 **REQUEST FOR PRODUCTION NO. 88:**

10 To the extent that Documents responsive to Requests Nos. 85, 86, and 87 do not include
11 Documents relating to the Samsung Galaxy Nexus, all Documents responsive to Requests Nos. 85,
12 86, and 87 relating to the Samsung Galaxy Nexus.

13
14 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 88:**

15 In addition to its Objections and Responses Common to All Requests for Production,
16 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
17 (i) it is overly broad and unduly burdensome to the extent it seeks documents not relevant to
18 Apple's Motion for a Preliminary Injunction; (ii) it is unduly burdensome in that it would require
19 Samsung to produce again documents already deemed produced in this action by virtue of the
20 parties' Stipulation and [Proposed] Order Re Discovery, filed March 22, 2012; (iii) it seeks
21 documents containing confidential third party information, including information subject to a non-
22 disclosure or other agreement between Samsung and a third party, or documents subject to a
23 protective order; (iv) it seeks documents that are equally or more readily available to Apple than to
24 Samsung; (v) it is temporally and substantively overbroad in that it is not limited to any reasonable
25 time period and seeks documents and things related to products not at issue in this litigation; (vi) it
26 is vague, ambiguous, and unintelligible, in that it does not describe with reasonable particularity
27 each item or category of items to be inspected; and (vii) it seeks documents that are not relevant to
28 the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of

1 admissible evidence.

2

3 **REQUEST FOR PRODUCTION NO. 89:**

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

8

9 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 89:**

10 In addition to its Objections and Responses Common to All Requests for Production,
11 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
12 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
13 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
14 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the
15 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
16 temporally and substantively overbroad in that it is not limited to any reasonable time period and
17 seeks documents and things related to products not at issue in this litigation; (iv) it is vague and
18 ambiguous with regard to the terms “analysis,” “review,” “consideration,” “copying,” “designing,”
19 “developing,” “implementing,” and “comparison”; and (v) it seeks documents that are not relevant
20 to the claims or defenses of any party and/or not reasonably calculated to lead to the discovery of
21 admissible evidence.

22

23 **REQUEST FOR PRODUCTION NO. 90:**

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

28

1 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 90:**

2 In addition to its Objections and Responses Common to All Requests for Production,
3 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
4 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
5 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
6 any other applicable privilege or immunity; (ii) it is temporally and substantively overbroad in that
7 it is not limited to any reasonable time period and seeks documents and things related to products
8 not at issue in this litigation or the motion for preliminary injunction; (iii) it seeks documents that
9 are equally or more readily available to Apple than to Samsung, including documents and things
10 that are publicly available; (iv) it is vague and ambiguous with regard to the terms “promotional
11 materials,” “marketing plans,” “market surveys,” and “focus group studies”; and (v) it seeks
12 documents that are not relevant to the claims or defenses of any party and/or not reasonably
13 calculated to lead to the discovery of admissible evidence.

14 Notwithstanding the foregoing, and without waiving any objections, Samsung will produce
15 responsive, non-privileged documents in its possession, custody, or control, that can be located
16 based on a reasonable search.

17
18 **REQUEST FOR PRODUCTION NO. 91:**

19 All Documents relating to any instances of consumer confusion in which Samsung was
20 made aware that a person confused an Apple product for a Samsung Galaxy Nexus, or a Samsung
21 Galaxy Nexus for an Apple product.

22
23 **OBJECTIONS AND RESPONSE TO REQUEST FOR PRODUCTION NO. 91:**

24 In addition to its Objections and Responses Common to All Requests for Production,
25 which it hereby incorporates by reference, Samsung objects to this Request on the grounds that:
26 (i) it seeks to elicit information subject to and protected by the attorney-client privilege, the
27 attorney work-product doctrine, the joint defense privilege, the common interest doctrine, and/or
28 any other applicable privilege or immunity; (ii) it is overly broad and unduly burdensome to the

1 extent it seeks documents not relevant to Apple’s Motion for a Preliminary Injunction; (iii) it is
2 temporally and substantively overbroad in that it is not limited to any reasonable time period and
3 seeks documents and things related to products not at issue in this litigation; (iv) it is overly broad
4 and unduly burdensome to the extent that it purports to require Samsung to seek information from
5 thousands of people; (v) it is vague and ambiguous with regard to the term “confused”; and (vi) it
6 seeks documents that are not relevant to the claims or defenses of any party and/or not reasonably
7 calculated to lead to the discovery of admissible evidence.

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DATED: March 27, 2012

Respectfully submitted,

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