

EXHIBIT C

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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
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13 APPLE INC., a California corporation,
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Plaintiff,
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v.
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17 SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
18 ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
19 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

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

**APPLE INC.'S FIRST SET OF
PRELIMINARY INJUNCTION
INTERROGATORIES TO
DEFENDANTS**

APPLE INC.'S FIRST SET OF PRELIMINARY
INJUNCTION INTERROGATORIES
CASE NO. 12-cv-00630-LHK

1 APPLE INC. (“Apple”) hereby requests, pursuant to Rules 26 and 33 of the Federal Rules of Civil
2 Procedure, that SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA,
3 INC.; and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, (“Samsung” or
4 “Defendants”) respond to Apple’s First Set of Preliminary Injunction Interrogatories. Apple requests
5 that Defendants answer each interrogatory below and serve their answers on Apple’s counsel at the
6 offices of Gibson, Dunn & Crutcher, LLP, 1881 Page Mill Road, Palo Alto, CA 94304-1211, within
7 twenty-one (21) days, or such other time as the parties agree or the Court orders.

8 DEFINITIONS

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

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

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

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

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

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

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

19 7. “Preliminary Injunction Patents” means U.S. Patent Nos. 5, 946,647; 8,086,604;
20 8,046,721; and 8,074,172.

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

24 9. “Identify” means (1) when referring to a person, the person’s full name, present or last
25 known address and telephone number, and the last known title and place of employment; (2) when
26 referring to non-patent documents, the production number or type of document, its general nature and
27 subject matter, date of creation, and all author(s), addresses(s), and recipient(s); and (3) when
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1 referring to patent documents, the country, patent and/or application number, dates of filing,
2 publications, and grant, and the names of patentees or applicants.

3 INTERROGATORIES

4 INTERROGATORY NO. 1

5 Identify any and all code names, internal names, nick names, model numbers, or other
6 identifying information used by Samsung to identify or otherwise refer to the Samsung Galaxy Nexus
7 as well as any of the accused technologies implemented on the Samsung Galaxy Nexus, including but
8 not limited to, all versions of Android 4.0 Ice Cream Sandwich, Slide to Unlock, Text Correction,
9 Unified Search and Special Text Detection and identify the person(s) most knowledgeable about the
10 response to this interrogatory.
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12 INTERROGATORY NO. 2

13 Identify from the source code produced in response to Request Nos. 9-13 in Apple's First Set
14 of Preliminary Injunction Requests for Production all files that relate to the accused features and
15 functionality of the Samsung Galaxy Nexus, including Slide to Unlock, Text Correction, Unified
16 Search and Special Text Detection. Such identification should include, the name of the file, the
17 engineers, designers and authors responsible for that file, the specific accused feature to which the
18 identified file relates, and any differences between that file and the publicly available version of the
19 Android 4.0 Ice Cream Sandwich source code and the engineers, designers and authors of those
20 differences, and identify the person(s) most knowledgeable about the response to this interrogatory.
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22 INTERROGATORY NO. 3

23 For all source code files or modules identified or referenced in any expert declaration attached
24 to Apple's Motion for Preliminary Injunction, including the expert declarations of Dr. Todd Mowry,
25 Dr. Nathaniel Polish, Dr. Ravin Balakrishan and Dr. Karan Singh, identify whether the file or module
26 as referenced or identified is present in the Samsung Galaxy Nexus, or if it is not, identify any
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1 differences between that file and module and the version of the file or module that is present in the
2 Samsung Galaxy Nexus and, identify the person(s) most knowledgeable about the response to this
3 interrogatory.

4 **INTERROGATORY NO. 4**

5 Describe the facts and circumstances surrounding Samsung's knowledge of the Preliminary
6 Injunction Patents, including but not limited to, whether or not Samsung was aware of each of the
7 Preliminary Injunction Patents prior to the filing of this lawsuit; when Samsung became aware of
8 each of the Preliminary Injunction Patents; how Samsung became aware of each of the Preliminary
9 Injunction Patents; and any efforts made to avoid infringement of each of the Preliminary Injunction
10 Patents; and, identify the person(s) most knowledgeable about the response to this interrogatory, and
11 locate and identify all documents which refer or relate to the facts and assertions in the response or
12 which were reviewed in preparing the response to this interrogatory.
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15 **INTERROGATORY NO. 5**

16 If you contend or believe that you do not infringe any asserted claim of the Preliminary
17 Injunction Patents, state with specificity the complete factual and legal bases for such contention or
18 belief, including a claim chart identifying which claim limitations are not found in the Samsung
19 Galaxy Nexus, the claim constructions or definitions used in supporting this contention or belief, and
20 if you believe that any claim or claim limitation is governed but 35 U.S.C. 112 ¶ 6, identify the
21 factual and legal basis for that belief and the corresponding structure, material, or acts described in
22 the specification and equivalents thereof and further including an identification of all documents and
23 things supporting such contention or belief, and an identification of the persons most knowledgeable
24 of the facts supporting such contention or belief.
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1 **INTERROGATORY NO. 6**

2 If you contend or believe that any asserted claim of the Preliminary Injunction Patents is
3 invalid and/or unenforceable, state with specificity the complete factual and legal bases for such
4 contention or belief, including an identification of all alleged prior art, a claim chart showing where
5 each limitation of each claim can be found in the alleged prior art, the claim constructions or
6 definitions used in supporting this contention or belief, and if you believe that any claim or claim
7 limitation is governed but 35 U.S.C. 112 ¶ 6, identify the factual and legal basis for that belief and the
8 corresponding structure, material, or acts described in the specification and equivalents thereof and
9 an identification of all documents and things (including, but not limited to, alleged prior art)
10 supporting such contention or belief, an identification of the specific provision of Title 35 upon
11 which such contention or belief is based, and an identification of the persons most knowledgeable of
12 the facts supporting such contention or belief.
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15 **INTERROGATORY NO. 7**

16 If you contend or believe that Apple has not been or will not be irreparably harmed by the sale
17 of the Samsung Galaxy Nexus, state with specificity the complete factual and legal bases for such
18 contention or belief, including but not limited to all factual and legal bases covering any contention or
19 belief that the smartphone market is not undergoing a transformation whereby consumers are
20 purchasing their first smartphone, that customers are not loyal to the platform or operating system of
21 their first smartphone, and that Samsung is not marketing its smartphones to first time smartphone
22 buyers or customers and identify all documents and things relating to your response, and any persons
23 with knowledge regarding your response.
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25 **INTERROGATORY NO. 8**

26 Identify and describe in detail any analysis, review, consideration, or copying of, or
27 comparison against any Apple product or product feature in designing or developing, or
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1 implementing a feature during the design and/or development of any Samsung smartphone or tablet
2 computer and identify all documents and things relating to your response, and any persons with
3 knowledge regarding your response.

4 **INTERROGATORY NO. 9**

5 For each of the accused features, including Slide to Unlock, Text Correction, Unified Search
6 and Special Text Detection, identify and describe in detail any analysis, whether internal or external,
7 including, but not limited to, any consumer study, consumer demand analysis, survey, or report, or
8 other analysis or discussion, and identify all documents and things relating to your response, and any
9 persons with knowledge regarding your response.
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11 **INTERROGATORY NO. 10**

12 For each of the following, identify all discussions, internally or with third parties, regarding,
13 or consideration of, the design, and implementation of, any of the accused features, including (i)
14 Slide to Unlock, (ii) Text Correction, (iii) Unified Search, and (iv) Special Text Detection as
15 implemented in any Samsung product, including but not limited to Samsung smartphones and tablet
16 computers, and identify the three persons most knowledgeable about such discussions, designs, and
17 implementation.
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1 Dated: March 6, 2012

GIBSON, DUNN & CRUTCHER LLP

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4 By: H. Mark Lyon
H. Mark Lyon

5 *Attorneys for Apple Inc.*

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