

EXHIBIT 13

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24 LTD., SAMSUNG ELECTRONICS AMERICA,
25 INC. and SAMSUNG
26 TELECOMMUNICATIONS AMERICA, LLC

27 UNITED STATES DISTRICT COURT

28 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

29 APPLE INC., a California corporation,

30 Plaintiff,

31 vs.

32 SAMSUNG ELECTRONICS CO., LTD., a
33 Korean business entity; SAMSUNG
34 ELECTRONICS AMERICA, INC., a New
35 York corporation; SAMSUNG
36 TELECOMMUNICATIONS AMERICA,
37 LLC, a Delaware limited liability company,

38 Defendant.

CASE NO. 12-cv-00630-LHK

**SAMSUNG'S OBJECTIONS AND
RESPONSES TO APPLE'S FIRST SET OF
PRELIMINARY INJUNCTION
INTERROGATORIES**

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants Samsung
2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC, (“Samsung”) submit the following objections and responses to Plaintiff Apple
4 Inc’s (“Apple’s”) First Set of Preliminary Injunction Interrogatories to Defendants.

5 Samsung expressly incorporates the following General Objections as though set forth fully
6 in response to each of the following individual interrogatories and, to the extent that they are not
7 raised in any particular response, Samsung does not waive those objections.

8 **GENERAL OBJECTIONS**

9 The following general objections apply to each and every interrogatory propounded by
10 Plaintiff, and are incorporated into each of the following responses by reference as if set forth fully
11 therein:

12 1. Samsung objects to the “Definitions” and “Instructions” contained in Apple’s First
13 Set of Interrogatories to the extent they are inconsistent with the Federal Rules of Civil Procedure.

14 2. Samsung objects to Apple’s Definition of “Samsung,” “You,” “Your,” and
15 “Defendants” as overly broad to the extent it requires Samsung to pursue information from
16 individuals no longer employed by Samsung whose data is not currently in the possession of
17 Samsung. Samsung further objects to Apple’s Definition of “Samsung,” “You,” “Your,” and
18 “Defendants” as overly broad, vague, and ambiguous to the extent it does not define “affiliates,”
19 and also to the extent that it requires Samsung to potentially seek information from thousands of
20 people. Samsung will respond to interrogatories based on a reasonable inquiry of individuals
21 expected to possess the requested information.

22 3. Samsung objects to these interrogatories on the ground and to the extent they seek
23 information not relevant to a determination of Apple’s Motion for a Preliminary Injunction, filed
24 February 8, 2012. Such discovery is not authorized at this time under the Federal Rules of Civil
25 Procedure or under the Court’s February 22, 2012 Order Setting Briefing and Hearing Schedule
26 for Preliminary Injunction Motion. Samsung will provide information that is reasonably likely to
27 lead to the discovery of admissible evidence relevant to Apple’s Motion for a Preliminary
28 Injunction.

1 4. Samsung objects generally to each interrogatory to the extent that it seeks to elicit
2 information subject to and protected by the attorney-client privilege, the attorney work-product
3 doctrine, the joint defense privilege, the common interest doctrine, and/or any other applicable
4 privilege or immunity. Any inadvertent disclosure of such information shall not be deemed a
5 waiver of the attorney-client privilege, the work product doctrine, or any other applicable
6 privilege or immunity recognized by statute or case law. Samsung will exchange with Apple a
7 log of withheld documents at a time agreed to by counsel for the parties. Samsung objects
8 generally to the logging of privileged documents that were created on or after the date of filing of
9 the original Complaint (on February 8, 2012). Samsung will not log privileged documents that
10 were created on or after February 8, 2012.

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

14 6. Samsung objects generally to the interrogatories to the extent they seek
15 information from outside a reasonable time period or from a point other than a reasonable time, or
16 seek information about products outside the United States, on the ground that such information is
17 irrelevant.

18 7. Samsung objects to these interrogatories to the extent they seek to compel
19 Samsung to generate or create information and/or documents that do not already exist.

20 8. Samsung objects generally to the interrogatories on the ground and to the extent
21 that they prematurely call for contentions, identification of prior art, or identification of witnesses
22 at this stage of the litigation. Samsung will provide its contentions regarding non-infringement,
23 invalidity, and other issues according to the procedural schedule established by the Court,
24 including the Court's February 22, 2012 Order Setting Briefing and Hearing Schedule for
25 Preliminary Injunction Motion.

26 9. Samsung objects to each interrogatory to the extent it is duplicative or cumulative
27 of another interrogatory or other discovery.

28 10. Samsung objects to each interrogatory to the extent it is compound and comprises

1 discrete subparts resulting in separate interrogatories.

2 11. Samsung expressly reserves the right to respond to any or all of the interrogatories
3 by specifying documents wherein the responsive information may be ascertained pursuant to Rule
4 33(d) of the Federal Rules of Civil Procedure.

5 12. Samsung objects generally to the interrogatories to the extent they seek
6 confidential proprietary or trade secret information of third parties. Samsung will endeavor to
7 work with third parties to obtain their consent, if necessary, before identifying or producing such
8 information and/or documents.

9 13. Samsung objects generally to the interrogatories on the grounds that they are
10 overly broad, unduly burdensome, and neither relevant nor reasonably calculated to lead to the
11 discovery of admissible evidence.

12 14. Samsung objects to the interrogatories on the ground that they are overly broad,
13 unduly burdensome and oppressive to the extent they purport to require Samsung to search its
14 facilities and inquire of their employees other than those in its facilities and employees that would
15 reasonably be expected to have responsive information. Samsung's responses are based upon (1)
16 a reasonable search and investigation of facilities and files that could reasonably be expected to
17 contain responsive information, and (2) inquiries of Samsung's employees and/or representatives
18 who could reasonably be expected to possess responsive information.

19 15. Samsung objects to the interrogatories on the grounds that they seek information
20 already in the possession of Apple, publicly available, or as readily available to Apple as it is to
21 Samsung.

22 16. Samsung objects to the interrogatories on the grounds and to the extent that they
23 seek legal conclusions or call for expert testimony. Samsung's responses should not be construed
24 to provide legal conclusions.

25 17. Samsung objects to the interrogatories on the ground that discovery is continuing
26 in this action, and Samsung has not yet completed its factual investigation. The following
27 responses reflect the information reasonably available to Samsung at this time. Samsung reserves
28 its right to amend or supplement these responses and any production of documents as additional

1 discovery and investigation continue, in the event that additional information is disclosed, or in
2 the event of error, inadvertent mistake, or omission.

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

5
6 **SPECIFIC OBJECTIONS AND RESPONSES**

7
8 **INTERROGATORY NO. 1:**

9 Identify any and all code names, internal names, nick names, model numbers, or other
10 identifying information used by Samsung to identify or otherwise refer to the Samsung Galaxy
11 Nexus as well as any of the accused technologies implemented on the Samsung Galaxy Nexus,
12 including but not limited to, all versions of Android 4.0 Ice Cream Sandwich, Slide to Unlock,
13 Text Correction, Unified Search and Special Text Detection and identify the person(s) most
14 knowledgeable about the response to this interrogatory.

15
16 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 1:**

17 In addition to its General Objections above, which it hereby incorporates by reference,
18 Samsung objects to this Interrogatory on the grounds that: (i) it is vague and ambiguous with
19 regard to the terms “code names,” “internal names,” “nick names,” and “other identifying
20 information; (ii) it is vague, ambiguous, and unintelligible to the extent it seeks information about
21 any “accused technologies” that are not specifically identified in the interrogatory; (iii) it is overly
22 broad and unduly burdensome to the extent it seeks information not relevant to Apple’s Motion for
23 a Preliminary Injunction; and (iv) it is compound and comprises discrete subparts resulting in
24 separate interrogatories.

25 Subject to and without waiving the foregoing general and specific objections, Samsung
26 responds as follows:

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1 While in development, Samsung's Galaxy Nexus was sometimes referred to within
2 Samsung as "Proxima" or "Nexus Prime." Samsung model numbers for the Galaxy Nexus include
3 I515 and GT-I9250.

4 Android 4.0 Ice Cream Sandwich is sometimes referred to within Samsung as "ICS."

5 The technology identified in the interrogatory as "Slide to Unlock" is sometimes referred
6 to within Samsung as "Slide to Unlock."

7 The technology identified in the interrogatory as "Text Correction" is sometimes referred
8 to within Samsung as "predictive text."

9 The technology identified in the interrogatory as "Unified Search" is sometimes referred to
10 within Samsung as "Quick Search."

11 The technology identified in the interrogatory as "Special Text Detection" is a feature of
12 what is sometimes referred to within Samsung as "Browser."

13 Jisun Park, Principal Engineer, Systems Software, R&D, is knowledgeable regarding the
14 information contained in this response.

15
16 **INTERROGATORY NO. 2:**

17 Identify from the source code produced in response to Request Nos. 9-13 in Apple's First
18 Set of Preliminary Injunction Requests for Production all files that relate to the accused features
19 and functionality of the Samsung Galaxy Nexus, including Slide to Unlock, Text Correction,
20 Unified Search and Special Text Detection. Such identification should include, the name of the
21 file, the engineers, designers and authors responsible for that file, the specific accused feature to
22 which the identified file relates, and any differences between that file and the publicly available
23 version of the Android 4.0 Ice Cream Sandwich source code and the engineers, designers and
24 authors of those differences, and identify the person(s) most knowledgeable about the response to
25 this interrogatory.

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1 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 2:**

2 In addition to its General Objections above, which it hereby incorporates by reference,
3 Samsung objects to this Interrogatory on the grounds that: (i) it seeks information that is outside
4 of Samsung’s possession, custody, or control, or that is equally available to Apple; (ii) it seeks to
5 elicit information subject to and protected by the attorney-client privilege, the attorney work-
6 product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
7 applicable privilege or immunity; (iii) it is overly broad, unduly burdensome, and neither relevant
8 nor reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks
9 “all files” that relate to documents produced in response to Request Nos. 9–13; (iv) it is unduly
10 burdensome to the extent that it would require a comparative analysis of different versions of the
11 Android 4.0 Ice Cream Sandwich source code; (v) it is compound and comprises discrete subparts
12 resulting in separate interrogatories; and (vi) it is vague and ambiguous, particularly as to the
13 terms “files,” “relate to,” “responsible for that file,” “publicly available version of the Android 4.0
14 Ice Cream Sandwich source code,” and “engineers, designers and authors of those differences.”

15 Subject to and without waiving the foregoing general and specific objections, Samsung
16 responds as follows:

17 The source code for the version of Ice Cream Sandwich used on Galaxy Nexus was written
18 by Google, not Samsung. Samsung does not have possession of the source code; Google provides
19 Samsung with object code in binary form to be installed onto the Galaxy Nexus. The binary
20 object code is unreadable by a human being.

21
22 **INTERROGATORY NO. 3:**

23 For all source code files or modules identified or referenced in any expert declaration
24 attached to Apple’s Motion for Preliminary Injunction, including the expert declarations of Dr.
25 Todd Mowry, Dr. Nathaniel Polish, Dr. Ravin Balakrishan and Dr. Karan Singh, identify whether
26 the file or module as referenced or identified is present in the Samsung Galaxy Nexus, or if it is
27 not, identify any differences between that file and module and the version of the file or module
28

1 that is present in the Samsung Galaxy Nexus and, identify the person(s) most knowledgeable
2 about the response to this interrogatory.

3
4 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 3:**

5 In addition to its General Objections above, which it hereby incorporates by reference,
6 Samsung objects to this Interrogatory on the grounds that: (i) it seeks information that is outside
7 of Samsung's possession, custody, or control, or that is equally available to Apple; (ii) it seeks to
8 elicit information subject to and protected by the attorney-client privilege, the attorney work-
9 product doctrine, the joint defense privilege, the common interest doctrine, and/or any other
10 applicable privilege or immunity; (iii) it is overly broad, unduly burdensome, and neither relevant
11 nor reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks
12 "source code files or modules" referenced in "any expert declaration attached to Apple's Motion
13 for Preliminary Injunction, including the expert declarations of Dr. Todd Mowry, Dr. Nathaniel
14 Polish, Dr. Ravin Balakrishan and Dr. Karan Singh"; (iv) it is unduly burdensome to the extent
15 that it would require a comparative analysis of different versions of the Android 4.0 Ice Cream
16 Sandwich source code; (v) it is compound and comprises discrete subparts resulting in separate
17 interrogatories; and (vi) it is vague and ambiguous, particularly as to the terms "module" and
18 "file."

19 Subject to and without waiving the foregoing general and specific objections, Samsung
20 responds as follows:

21 The source code for the version of Ice Cream Sandwich used on Galaxy Nexus was written
22 by Google, not Samsung. Samsung does not have possession of the source code; Google provides
23 Samsung with object code in binary form to be installed onto the Galaxy Nexus. The binary
24 object code is unreadable by a human being.

25
26 **INTERROGATORY NO. 4:**

27 Describe the facts and circumstances surrounding Samsung's knowledge of the
28 Preliminary Injunction Patents, including but not limited to, whether or not Samsung was aware of

1 each of the Preliminary Injunction Patents prior to the filing of this lawsuit; when Samsung
2 became aware of each of the Preliminary Injunction Patents; how Samsung became aware of each
3 of the Preliminary Injunction Patents; and any efforts made to avoid infringement of each of the
4 Preliminary Injunction Patents; and, identify the person(s) most knowledgeable about the response
5 to this interrogatory, and locate and identify all documents which refer or relate to the facts and
6 assertions in the response or which were reviewed in preparing the response to this interrogatory.

7
8 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 4:**

9 In addition to its General Objections above, which it hereby incorporates by reference,
10 Samsung objects to this Interrogatory on the grounds that: (i) it seeks to elicit information subject
11 to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint
12 defense privilege, the common interest doctrine, and/or any other applicable privilege or
13 immunity; (ii) it is overly broad and unduly burdensome to the extent that it seeks “facts and
14 circumstances surrounding” Samsung's knowledge of the preliminary injunction patents; (iii) it is
15 overly broad and unduly burdensome in that it seeks information not relevant to Apple’s Motion
16 for a Preliminary Injunction; (iv) it seeks information that is not relevant and not reasonably
17 calculated to lead to the discovery of admissible evidence; (v) it is vague and ambiguous; (vi) it
18 calls for legal conclusions; and (vii) it is compound and comprises discrete subparts resulting in
19 separate interrogatories.

20
21 **INTERROGATORY NO. 5:**

22 If you contend or believe that you do not infringe any asserted claim of the Preliminary
23 Injunction Patents, state with specificity the complete factual and legal bases for such contention
24 or belief, including a claim chart identifying which claim limitations are not found in the Samsung
25 Galaxy Nexus, the claim constructions or definitions used in supporting this contention or belief,
26 and if you believe that any claim or claim limitation is governed but 35 U.S.C. 112 ¶ 6, identify
27 the factual and legal basis for that belief and the corresponding structure, material, or acts
28 described in the specification and equivalents thereof and further including an identification of all

1 documents and things supporting such contention or belief, and an identification of the persons
2 most knowledgeable of the facts supporting such contention or belief.

3
4 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 5:**

5 In addition to its General Objections above, which it hereby incorporates by reference,
6 Samsung objects to this Interrogatory to the extent that: (i) it prematurely seeks disclosure of
7 Samsung's non-infringement contentions, in violation of the Federal Rules of Civil Procedure, this
8 Court's Local Rules, the Court's February 8, 2012 Order Setting Initial Case Management
9 Conference and ADR Deadlines, the Court's February 22, 2012 Order Setting Briefing and
10 Hearing Schedule for Preliminary Injunction Motion; (ii) it seeks to elicit information subject to
11 and protected by the attorney-client privilege, the attorney work-product doctrine, the joint defense
12 privilege, the common interest doctrine, and/or any other applicable privilege or immunity; (iii) it
13 is overbroad and unduly burdensome to the extent it purports to require Samsung to create
14 information or documents that do not already exist; (iv) it is vague and ambiguous and calls for
15 speculation, particularly as to the term "equivalents thereof"; and (v) it is compound and
16 comprises discrete subparts resulting in separate interrogatories.

17
18 **INTERROGATORY NO. 6:**

19 If you contend or believe that any asserted claim of the Preliminary Injunction Patents is
20 invalid and/or unenforceable, state with specificity the complete factual and legal bases for such
21 contention or belief, including an identification of all alleged prior art, a claim chart showing
22 where each limitation of each claim can be found in the alleged prior art, the claim constructions
23 or definitions used in supporting this contention or belief, and if you believe that any claim or
24 claim limitation is governed but 35 U.S.C. 112 ¶ 6, identify the factual and legal basis for that
25 belief and the corresponding structure, material, or acts described in the specification and
26 equivalents thereof and an identification of all documents and things (including, but not limited to,
27 alleged prior art) supporting such contention or belief, an identification of the specific provision of
28

1 Title 35 upon which such contention or belief is based, and an identification of the persons most
2 knowledgeable of the facts supporting such contention or belief.

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4 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 6:**

5 In addition to its General Objections above, which it hereby incorporates by reference,
6 Samsung objects to this Interrogatory to the extent that: (i) it prematurely seeks disclosure of
7 Samsung’s invalidity and unenforceability contentions, in violation of the Federal Rules of Civil
8 Procedure, this Court’s Local Rules, the Court’s February 8, 2012 Order Setting Initial Case
9 Management Conference and ADR Deadlines, the Court’s February 22, 2012 Order Setting
10 Briefing and Hearing Schedule for Preliminary Injunction Motion; (ii) it seeks to elicit information
11 subject to and protected by the attorney-client privilege, the attorney work-product doctrine, the
12 joint defense privilege, the common interest doctrine, and/or any other applicable privilege or
13 immunity; (iii) it is overbroad and unduly burdensome to the extent it purports to require Samsung
14 to create information or documents that do not already exist; (iv) it is vague and ambiguous and
15 calls for speculation, particularly as to the term “equivalents thereof”; and (v) it is compound and
16 comprises discrete subparts resulting in separate interrogatories.

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18 **INTERROGATORY NO. 7:**

19 If you contend or believe that Apple has not been or will not be irreparably harmed by the
20 sale of the Samsung Galaxy Nexus, state with specificity the complete factual and legal bases for
21 such contention or belief, including but not limited to all factual and legal bases covering any
22 contention or belief that the smartphone market is not undergoing a transformation whereby
23 consumers are purchasing their first smartphone, that customers are not loyal to the platform or
24 operating system of their first smartphone, and that Samsung is not marketing its smartphones to
25 first time smartphone buyers or customers and identify all documents and things relating to your
26 response, and any persons with knowledge regarding your response.

27

28

1 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 7:**

2 In addition to its General Objections above, which it hereby incorporates by reference,
3 Samsung objects to this Interrogatory to the extent that: (i) it prematurely seeks disclosure of
4 Samsung’s contentions regarding alleged irreparable harm, in violation of the Federal Rules of
5 Civil Procedure, this Court’s Local Rules, the Court’s February 8, 2012 Order Setting Initial Case
6 Management Conference and ADR Deadlines, the Court’s February 22, 2012 Order Setting
7 Briefing and Hearing Schedule for Preliminary Injunction Motion; (ii) it seeks to elicit information
8 subject to and protected by the attorney-client privilege, the attorney work-product doctrine, the
9 joint defense privilege, the common interest doctrine, and/or any other applicable privilege or
10 immunity; (iii) it is vague and ambiguous, particularly as to the terms “smartphone market,”
11 “transformation,” and “loyal”; and (iv) it is compound and comprises discrete subparts resulting in
12 separate interrogatories.

13
14 **INTERROGATORY NO. 8:**

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

20
21 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 8:**

22 In addition to its General Objections above, which it hereby incorporates by reference,
23 Samsung objects to this Interrogatory on the ground that: (i) it seeks to elicit information subject
24 to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint
25 defense privilege, the common interest doctrine, and/or any other applicable privilege or
26 immunity; (ii) it is overly broad and unduly burdensome in that it seeks information not relevant to
27 Apple’s Motion for a Preliminary Injunction; (iii) it seeks information that is not relevant and not
28 reasonably calculated to lead to the discovery of admissible evidence; (iv) it is vague and

1 ambiguous; and (v) it is compound and comprises discrete subparts resulting in separate
2 interrogatories.

3
4 **INTERROGATORY NO. 9:**

5 For each of the accused features, including Slide to Unlock, Text Correction, Unified
6 Search and Special Text Detection, identify and describe in detail any analysis, whether internal or
7 external, including, but not limited to, any consumer study, consumer demand analysis, survey, or
8 report, or other analysis or discussion, and identify all documents and things relating to your
9 response, and any persons with knowledge regarding your response.

10
11 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 9:**

12 In addition to its General Objections above, which it hereby incorporates by reference,
13 Samsung objects to this Interrogatory on the ground that: (i) it seeks to elicit information subject
14 to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint
15 defense privilege, the common interest doctrine, and/or any other applicable privilege or
16 immunity; (ii) it is overly broad and unduly burdensome in that it seeks information not relevant to
17 Apple’s Motion for a Preliminary Injunction; (iii) it is vague and ambiguous, especially with
18 regard to the terms “analysis,” “consumer study,” “consumer demand analysis,” “survey,” “report,”
19 and “other analysis or discussion”; (iv) it is vague, ambiguous, and unintelligible to the extent it
20 seeks information about any “accused features” that are not specifically identified in the
21 interrogatory; and (v) it is compound and comprises discrete subparts resulting in separate
22 interrogatories.

23 Subject to and without waiving the foregoing general and specific objections, Samsung
24 responds as follows:

25 The features identified in this interrogatory – Slide to Unlock, Text Correction, Unified
26 Search and Special Text Detection – were developed by Google, not Samsung. Samsung is
27 presently unaware of any consumer studies, analyses, or reports regarding these features.
28 Samsung's investigation is ongoing and, to the extent that Samsung's investigation subsequently

1 reveals the existence of any such consumer studies, analyses, or reports regarding these features,
2 then Samsung will supplement this response accordingly as well as produce responsive non-
3 privileged documents regarding any such consumer studies, analyses, or reports regarding these
4 features.

5
6 **INTERROGATORY NO. 10:**

7 For each of the following, identify all discussions, internally or with third parties,
8 regarding, or consideration of, the design, and implementation of, any of the accused features,
9 including (i) Slide to Unlock, (ii) Text Correction, (iii) Unified Search, and (iv) Special Text
10 Detection as implemented in any Samsung product, including but not limited to Samsung
11 smartphones and tablet computers, and identify the three persons most knowledgeable about such
12 discussions, designs, and implementation.

13
14 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 10:**

15 In addition to its General Objections above, which it hereby incorporates by reference,
16 Samsung objects to this Interrogatory on the ground that: (i) it seeks to elicit information subject
17 to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint
18 defense privilege, the common interest doctrine, and/or any other applicable privilege or
19 immunity; (ii) it is overly broad and unduly burdensome in that it seeks information not relevant to
20 Apple's Motion for a Preliminary Injunction; (iii) it is overly broad, unduly burdensome, and
21 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence to the
22 extent that it seeks "all discussions . . . or consideration of" "any of the accused features"; (iv) it
23 seeks confidential proprietary or trade secret information of a third party (Google); (v) it is vague
24 and ambiguous, especially with regard to the term "consideration of"; (vi) it is vague, ambiguous,
25 and unintelligible to the extent it seeks information about any "accused features" that are not
26 specifically identified in the interrogatory; and (vii) it is compound and comprises discrete
27 subparts resulting in separate interrogatories.

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1 Subject to and without waiving the foregoing general and specific objections, Samsung
2 responds as follows:

3 Samsung is presently unaware of any non-privileged discussions, internally or externally,
4 regarding design or implementation of the four accused features – Slide to Unlock, Text
5 Correction, Unified Search and Special Text Detection – of Galaxy Nexus. Samsung's
6 investigation is ongoing and, to the extent that Samsung's investigation subsequently reveals the
7 existence of any such discussions, then Samsung will supplement this response accordingly as
8 well as produce responsive non-privileged documents regarding such discussions.

9

10 DATED: March 27, 2012

Respectfully submitted,

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QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Patrick M. Shields

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TELECOMMUNICATIONS AMERICA, LLC

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