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CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
15

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
18

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
23 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
24 TELECOMMUNICATIONS
AMERICA, LLC, a Delaware limited liability
25 company,

26 Defendant.
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF DIANE C.
HUTNYAN IN SUPPORT OF
SAMSUNG'S OBJECTIONS TO
TENTATIVE JURY INSTRUCTIONS**

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DECLARATION OF DIANE C. HUTNYAN

I, Diane C. Hutnyan, declare as follows:

1. I am a member of the bar of the State of California and a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit A** is Samsung’s Proposed Jury Instruction No. 39.

3. Attached hereto as **Exhibit B** is Samsung’s Proposed Redlines of the Court’s Jury Instruction No. 32.

4. Attached hereto as **Exhibit C** is Samsung’s Previously Proposed Jury Instruction No. 44

5. Attached hereto as **Exhibit D** is Samsung’s Proposed Jury Instruction No. 51.

6. Attached hereto as **Exhibit E** is Samsung’s Proposed Jury Instruction No. 58.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed August 20, 2012, at San Jose, California.



Diane C. Hutnyan