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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 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.  
25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S RESPONSE TO ORDER  
REGARDING INFORMATION FOR  
DAMAGES INSTRUCTIONS**

1 Samsung respectfully responds to the Court's order requesting information for damages  
2 instructions (Dkt. No. 1851) as follows:

3 Samsung seeks only one type of damages, namely a reasonable royalty, and asserts only  
4 utility patents. The chart below provides the requested information corresponding to final jury  
5 instruction number 61.3.

Samsung's Patents	Type of award	Amount of award
U.S. Patent No. 7,577,460	Reasonable royalty	
U.S. Patent No. 7,456,893	Reasonable royalty	
U.S. Patent No. 7,698,711	Reasonable royalty	
U.S. Patent Nos. 7,447,516 and/or 7,675,941*	Reasonable royalty	
<b>TOTAL</b>		

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14 \*Samsung contends that infringement of one or both of the '516 and '941 patents (Samsung's high  
15 speed data patents) entitles it to the same range of reasonable royalty award.

16 Samsung seeks a separate reasonable royalty award for infringement of each of the four  
17 patent categories above on each infringing device. Separate reasonable royalty awards for  
18 infringement of different utility patents by the same device do not result in a forbidden duplicative  
19 recovery.

1 DATED: August 20, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

3 By /s/ Victoria F. Maroulis

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