

Exhibit B

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

26 UNITED STATES DISTRICT COURT

27 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

28 APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG ELECTRONICS
AMERICA, INC., a New York corporation; and
SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC, a Delaware limited liability
company,

Defendants.

Case No. 11-cv-01846-LHK (PSG)

**SAMSUNG'S PROPOSED SPECIAL
VERDICT FORM**

Judge: Hon. Lucy H. Koh
Place: Courtroom 8, 4th Floor
Trial: July 30, 2012 at 9 a.m.

1 We, the jury, unanimously agree to the answers to the following questions and return them under
 2 the instructions of this Court as our verdict in this case.

3 **FINDINGS ON APPLE’S CLAIMS**

4 **APPLE’S UTILITY AND DESIGN PATENT CLAIMS AGAINST SAMSUNG**

5 **1. For each of the following products, has Apple proven by a preponderance of the**
 6 **evidence that Samsung Telecommunications America, LLC (“STA”) infringed the**
 7 **indicated claims of Apple’s ‘381, ‘915 and ‘163 patents?**

8 (Please answer in each cell with a “Y” for “yes” (for Apple), or with an “N” for “no” (for
 9 Samsung). Do not answer for any cell that contains grey shading).

Samsung Product	‘381 Patent (Claim 19) Web Browser Application	‘381 Patent (Claim 19) Gallery Application	‘381 Patent (Claim 19) Contacts Application	‘915 Patent (Claim 8) Web Browser Application	‘163 Patent (Claim 50) Web Browser Application
Captive (JX 1011) Android Version: 2.1-update1					
Continuum (JX 1016) Android Version: 2.1-update1					
Droid Charge (JX 1025) Android Version: 2.2.1					
Epic 4G (JX 1012) Android Version: 2.2.1					
Exhibit 4G (JX 1028) Android Version: 2.3.3					
Fascinate (JX 1013) Android Version: 2.2.2					

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Samsung Product	'381 Patent (Claim 19) Web Browser Application	'381 Patent (Claim 19) Gallery Application	'381 Patent (Claim 19) Contacts Application	'915 Patent (Claim 8) Web Browser Application	'163 Patent (Claim 50) Web Browser Application
Galaxy Prevail (JX 1022) Android Version: 2.2.2					
Galaxy S II (AT&T) (JX 1031) Android Version: 2.3.4					
Galaxy S II (T-Mobile) (JX 1033) Android Version: 2.3.5					
Galaxy S 4G (JX 1019) Android Version: 2.2.1					
Gem (JX 1020) Android Version: 2.1-update1					
Indulge (JX 1026) Android Version: 2.2.1					
Infuse 4G (JX 1027) Android Version: 2.2.1					
Intercept (JX 1009) Android Version: 2.2.2					
Mesmerize (JX 1015) Android Version: 2.1-update1					
Nexus S 4G (JX					

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Samsung Product	'381 Patent (Claim 19) Web Browser Application	'381 Patent (Claim 19) Gallery Application	'381 Patent (Claim 19) Contacts Application	'915 Patent (Claim 8) Web Browser Application	'163 Patent (Claim 50) Web Browser Application
1023) Android Version: 2.3.4					
Replenish (JX 1024) Android Version: 2.2.2					
Transform (JX 1014) Android Version: 2.2.2					
Vibrant (JX 1010) Android Version: 2.1-update1					
Galaxy Tab 7.0 (JX 1036) Android Version: 2.3.5					
Galaxy Tab 10.1 (JX 1037) Android Version: 3.1					

2. For each of the following products, has Apple proven by a preponderance of the evidence that Samsung Electronics America, Inc. (“SEA”) infringed the indicated claims of Apple’s ’381, ’915, and ’163 patents?
 (Please answer in each cell with a “Y” for “yes” (for Apple), or with an “N” for “no” (for Samsung). Do not answer for any cell that contains grey shading).

Samsung Product	'381 Patent (Claim 19) Web Browser Application	'381 Patent (Claim 19) Gallery Application	'381 Patent (Claim 19) Contacts Application	'915 Patent (Claim 8) Web Browser Application	'163 Patent (Claim 50) Web Browser Application
Galaxy Tab 7.0 (JX 1036) Android Version: 2.3.5					
Galaxy Tab 10.1					

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(JX 1037)					
Android Version: 3.1					

[Samsung does not believe that Apple has properly raised an induced infringement claim, but has listed a proposed verdict form question below in the event the Court disagrees].

3. a. If you do not find infringement by STA or SEA, skip this question. Otherwise, for each of the following products, has Apple proven by a preponderance of the evidence that Samsung Electronics Co., Ltd. (“SEC”), knowing of the patent(s) you found infringed, took action that it knew or should have known would induce STA or SEA to infringe that patent(s)?¹

(Please answer in each cell with a “Y” for “yes” (for Apple), or with an “N” for “no” (for Samsung). Do not answer for any cell that contains grey shading).

Samsung Product	‘381 Patent (Claim 19) Web Browser Application	‘381 Patent (Claim 19) Gallery Application	‘381 Patent (Claim 19) Contacts Application	‘915 Patent (Claim 8) Web Browser Application	‘163 Patent (Claim 50) Web Browser Application
Captivate (JX 1011) Android Version: 2.1-update1					
Continuum (JX 1016) Android Version: 2.1-update1					
Droid Charge (JX 1025) Android Version: 2.2.1					
Epic 4G (JX 1012) Android Version: 2.2.1					
Exhibit 4G (JX 1028) Android Version: 2.3.3					

¹ There is no evidence that SEC directly infringed the ‘381, ‘915 or ‘163 patents. Consequently, the verdict form does not include a direct infringement question for SEC.

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Samsung Product	'381 Patent (Claim 19) Web Browser Application	'381 Patent (Claim 19) Gallery Application	'381 Patent (Claim 19) Contacts Application	'915 Patent (Claim 8) Web Browser Application	'163 Patent (Claim 50) Web Browser Application
Fascinate (JX 1013) Android Version: 2.2.2					
Galaxy Prevail (JX 1022) Android Version: 2.2.2					
Galaxy S II (AT&T) (JX 1031) Android Version: 2.3.4					
Galaxy S II (T- Mobile) (JX 1033) Android Version: 2.3.5					
Galaxy S 4G (JX 1019) Android Version: 2.2.1					
Gem (JX 1020) Android Version: 2.1-update1					
Indulge (JX 1026) Android Version: 2.2.1					
Infuse 4G (JX 1027) Android Version: 2.2.1					
Intercept (JX 1009) Android Version: 2.2.2					

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Samsung Product	'381 Patent (Claim 19) Web Browser Application	'381 Patent (Claim 19) Gallery Application	'381 Patent (Claim 19) Contacts Application	'915 Patent (Claim 8) Web Browser Application	'163 Patent (Claim 50) Web Browser Application
Mesmerize (JX 1015) Android Version: 2.1-update1					
Nexus S 4G (JX 1023) Android Version: 2.3.4					
Replenish (JX 1024) Android Version: 2.2.2					
Transform (JX 1014) Android Version: 2.2.2					
Vibrant (JX 1010) Android Version: 2.1-update1					
Galaxy Tab 7.0 (JX 1036) Android Version: 2.3.5					
Galaxy Tab 10.1 (JX 1037) Android Version: 3.1					

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b. For each of the following products, has Apple proven by a preponderance of the evidence that Samsung Electronics Co., Ltd. (“SEC”), knowing of the patent(s) you found infringed, took action that it knew or should have known would induce anyone other than STA or SEA to infringe that patent(s):

Samsung Product	‘381 Patent (Claim 19) Web Browser Application	‘381 Patent (Claim 19) Gallery Application	‘381 Patent (Claim 19) Contacts Application	‘915 Patent (Claim 8) Web Browser Application	‘163 Patent (Claim 50) Web Browser Application
Galaxy Ace (JX 1030) Android Version: 2.2.1					
Galaxy S (i9000) (JX 1007) Android Version: 2.2.1					
Galaxy S II (i9100) (JX 1032) Android Version: 2.3.3					

4. For each of the following products, has Apple proven by a preponderance of the evidence that SEA or STA infringed the indicated Apple design patents?

(Please answer in each cell with a “Y” for “yes” (for Apple), or with an “N” for “no” (for Samsung). Do not answer for any cell that contains gray shading).

Accused Samsung Product	D’677 Patent	D’087 Patent	D’305 Patent
Captivate (AT&T) (JX 1011)			
Continuum (AT&T) (JX 1016)			
Droid Charge (Verizon) (JX 1025)			
Epic 4G (Sprint) (JX 1012)			
Fascinate (Verizon) (JX 1013)			
Galaxy S 4G (T-Mobile) (JX 1019)			

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Galaxy S II (AT&T) (JX 1031)			
Galaxy S II (T-Mobile) (JX 1033)			
Galaxy S II Skyrocket (JX 1035)			
Galaxy S II Epic 4G Touch (JX 1034)			
Gem (U.S. Cellular) (JX 1020)			
Indulge (Cricket Communications) (JX 1026)			
Infuse 4G (AT&T) (JX 1027)			
Mesmerize (US Cellular) (JX 1015)			
Showcase i500 (C-Spire) (JX 1017)			
Vibrant (T-Mobile) (JX 1010)			

Accused Samsung Product	D'889 Patent
Galaxy Tab 10.1 (logo on front)	
Galaxy Tab 10.1 (no logo on front)	

[Samsung does not believe that Apple has properly raised an induced infringement claim, but has listed a proposed verdict form question below in the event the Court disagrees].

5. a. Did Apple prove by a preponderance of the evidence that SEC, knowing of any Apple design patent you found to be infringed, took action that it knew or should have known would induce anyone other than STA or SEA to infringe any of the following patents:

Accused Samsung Product	D'677 Patent	D'087 Patent	D'305 Patent
Galaxy Ace			
Galaxy S (i9000)			
Galaxy S II (i9100)			

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b. If you did not find infringement by STA or SEA in Question 4, skip this question. Otherwise, do you find that Apple has proven by a preponderance of the evidence that SEC, knowing of any Apple design patent you found to be infringed, took action that it knew or should have known would induce STA and/or SEA to infringe that patent?

Yes _____ (for Apple) No _____ (for Samsung)

6. If in response to Question Nos. 1-5 you found that any Samsung entity has infringed any Apple patent(s), has Apple proven by clear and convincing evidence that the Samsung entity actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of a valid and enforceable Apple patent?

Yes _____ (for Apple) No _____ (for Samsung)

If “yes,” please fill in the table below with a “Y” for any Samsung entity that you found actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of a valid and enforceable Apple patent:

Entity	'381 Patent (Claim 19)	'915 Patent (Claim 8)	'163 Patent (Claim 50)	D'677 Patent	D'087 Patent	D'889 Patent	D'305 Patent
STA							
SEA							
SEC							

7. Has Samsung proven by clear and convincing evidence that Apple’s asserted utility and/or design patent claims are invalid?

'381 Patent (Claim 19) Yes _____ (for Samsung) No _____ (for Apple)

'915 Patent (Claim 8) Yes _____ (for Samsung) No _____ (for Apple)

'163 Patent (Claim 50) Yes _____ (for Samsung) No _____ (for Apple)

D'677 Patent Yes _____ (for Samsung) No _____ (for Apple)

D'087 Patent Yes _____ (for Samsung) No _____ (for Apple)

D'889 Patent Yes _____ (for Samsung) No _____ (for Apple)

D'305 Patent Yes _____ (for Samsung) No _____ (for Apple)

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APPLE’S TRADE DRESS CLAIMS AGAINST SAMSUNG

8. Has Apple proven by a preponderance of the evidence that its asserted unregistered trade dresses are protectable?

Unregistered Claimed iPhone trade dress

Yes _____ (for Apple) No _____ (for Samsung)

Unregistered Claimed Combined iPhone trade dress

Yes _____ (for Apple) No _____ (for Samsung)

Unregistered Claimed iPad trade dress

Yes _____ (for Apple) No _____ (for Samsung)

9. Has Samsung proven by a preponderance of the evidence that Apple’s registered iPhone trade dress is not protectable?

Yes _____ (for Samsung) No _____ (for Apple)

10. For each asserted trade dress you found protectable in response to Questions 8 and 9, has Apple proven by a preponderance of the evidence that the asserted trade dress was famous before the time of Samsung’s alleged use?

In the chart of Question 12, please answer in the “Famous” row in the cell corresponding to each asserted trade dress column with a “Y” for “yes” (for Apple), an “N” for “no” (for Samsung), or “N/A” for not applicable if the asserted trade dress was not found protectable. Do not answer for any cell that contains gray shading.

11. For only those products for which you answered “Y” or “yes” in the “Famous” row in the chart of Question 12, has Apple proven by a preponderance of the evidence that Samsung diluted the indicated Apple trade dress?

In the chart of Question 12, please answer in each cell corresponding to an accused product with a “Y” for “yes” (for Apple), or with an “N” for “no” (for Samsung). Do not answer for any cell that contains gray shading.

12. Please complete the chart below using your responses to Questions 10 – 11.

Accused Samsung Product	Dilution		
	Claimed iPhone Trade Dress	Claimed iPhone 3 Trade Dress	Claimed registered iPhone Trade Dress
Famous?			
Galaxy S Captivate (JX 1011)			
Galaxy S Continuum (JX 1016)			
Droid Charge (JX 1025)			
Galaxy S Epic 4G (JX 1012)			
Fascinate (Verizon) (JX 1013)			
Galaxy Prevail (JX 1022)			
Galaxy S 4G (T-Mobile) (JX 1019)			
Galaxy S II (AT&T) (JX 1031)			
Galaxy S II (T-Mobile) (JX 1033)			
Galaxy S II Epic 4G Touch (JX 1034)			
Galaxy S II Skyrocket (JX 1035)			
Infuse 4G (AT&T) (JX 1027)			
Mesmerize (Verizon) (JX 1015)			
Showcase i500 (C-Spire) (JX 1017)			
Vibrant (T-Mobile) (JX 1010)			

Accused Samsung Product	Dilution of claimed iPad Trade Dress
Is the asserted iPad Trade dress Famous?	
Galaxy Tab 10.1 (logo on front)	

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Galaxy Tab 10.1 (no logo on front)	
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13. If you answered “yes” to Question 8 for Apple’s asserted iPad/iPad2 trade dress, has Apple proven by a preponderance of the evidence that Samsung infringed the asserted trade dress you found protectable?

Galaxy Tab 10.1 (logo on front)

Yes _____ (for Apple) No _____ (for Samsung)

Galaxy Tab 10.1 (no logo on front)

Yes _____ (for Apple) No _____ (for Samsung)

14. If you responded “Y” or “yes” to Questions 12 or 13, which of the Samsung entities do you find liable?

STA Yes _____ No _____

SEA Yes _____ No _____

[Samsung does not believe that induced infringement is appropriate for Apple’s trade dress claims, but has listed a proposed verdict form question below in the event the Court disagrees].

15. a. Did Apple prove by a preponderance of the evidence that SEC, knowing of any asserted Apple trade dress you found to be infringed, took action that it knew or should have known would induce anyone other than STA or SEA to infringe any of the following patents:

Accused Samsung Product	Claimed iPhone Trade Dress	Claimed iPhone 3 Trade Dress	Claimed registered iPhone Trade Dress
Galaxy Ace			
Galaxy S (i9000)			
Galaxy S II (i9100)			

b. If you did not find infringement by STA or SEA, skip this question. Otherwise, has Apple proven by a preponderance of the evidence that SEC, knowing of Apple’s unregistered iPad trade dress, took action that it knew or should have known would induce STA or SEA to infringe the iPad trade dress?

Yes _____ (for Apple) No _____ (for Samsung)

1 **16. If you found STA and/or SEA liable on any Apple trade dress dilution claim, do you**
 2 **find by clear and convincing evidence that it diluted and willfully intended to cause**
 3 **dilution of the trade dress?**

4 STA Yes _____ No _____
 5 SEA Yes _____ No _____

6 **17. If you found STA and/or SEA liable on any Apple trade dress dilution claim, did**
 7 **Apple prove by a preponderance of the evidence that STA’s or SEA’s alleged use of**
 8 **the trade dress in fact injured or harmed the trade dress?**

9 STA Yes _____ No _____
 10 SEA Yes _____ No _____

11 **18. If you found STA, SEA, and/or SEC liable on Apple’s trade dress infringement claim,**
 12 **do you find that Apple has proven by a preponderance of the evidence both (a) that**
 13 **STA’s and/or SEA’s alleged use of the trade dress is likely to cause confusion among**
 14 **prospective purchasers as to the source, sponsorship, affiliation, or approval of the**
 15 **accused Samsung product and (b) that there was actual consumer confusion or that**
 16 **STA’s and/or SEA’s actions were intentionally deceptive?**

17 STA Yes _____ No _____
 18 SEA Yes _____ No _____
 19 SEC Yes _____ No _____

20 **19. If you found STA, SEA and/or SEC liable on Apple’s trade dress infringement claim,**
 21 **do you find by clear and convincing evidence that STA, SEA and/or SEC willfully**
 22 **intended to infringe the trade dress?**

23 STA Yes _____ No _____
 24 SEA Yes _____ No _____
 25 SEC Yes _____ No _____

26 **DAMAGES TO APPLE FROM SAMSUNG**

27 **20. Has Apple proven by a preponderance of the evidence that its iPhone and iPad**
 28 **products practice the asserted patent claims?**

Please fill in the table below with a “Y” for any Apple product that you found
practiced the asserted patent claim: (Do not answer for any cell that contains gray
shading).

Entity	‘381 Patent (Claim 19)	‘915 Patent (Claim 8)	‘163 Patent (Claim 50)	D’677 Patent	D’087 Patent	D’889 Patent	D’305 Patent
STA							
SEA							

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SEC							
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21. On what dates did Apple provide actual notice to STA, SEA, and SEC of Apple’s patents?

Entity	‘381 Patent	‘915 Patent	‘163 Patent	D’677 Patent	D’087 Patent	D’889 Patent	D’305 Patent
STA							
SEA							
SEC							

22. What is the amount that Apple is entitled to receive from Samsung on the claims on which you have ruled in favor of Apple, if any?

\$_____.

23. If you find that Apple is entitled to receive damages from Samsung, which Samsung entities are responsible for those damages?

STA Yes_____ No_____

SEA Yes_____ No_____

SEC Yes_____ No_____

24. If you find that Apple is entitled to receive damages from Samsung, how is the total amount of damages stated in Question 22 divided?

Lost profits \$_____

Reasonable royalty \$_____

Samsung’s profits \$_____

FINDINGS ON SAMSUNG’S CLAIMS

SAMSUNG’S UTILITY PATENT CLAIMS AGAINST APPLE

25. For each of the following products, has Samsung proven by a preponderance of the evidence that Apple infringed the indicated Samsung utility patent claims?

(Please answer in each cell with a “Y” for “yes” (for Samsung), or with an “N” for “no” (for Apple). You do not have to provide an answer for any cell that contains gray shading.)

Accused Apple Product	'516 Patent		'941 Patent		'711 Patent	'893 Patent	'460 Patent
	Claim 15	Claim 16	Claim 10	Claim 15	Claim 9	Claim 10	Claim 1
iPhone 3G (JX 1053)							
iPhone 3GS (JX 1054 and JX 1076)							
iPhone 4 (JX 1055 and JX 1056)							
iPad2 3G (JX 1050 and JX 1051)							
iPod Touch 4 th Gen. (JX 1057 and JX 1077)							

1 **26. If in response to Question No. 25 you found that Apple has infringed any Samsung**
2 **patent(s), has Samsung proven by clear and convincing evidence that Apple actually**
3 **knew or should have known that its actions constituted an unjustifiably high risk of**
4 **infringement of a valid and enforceable Samsung patent?**

Yes _____ (for Samsung) No _____ (for Apple)

5 **27. Has Apple proven by clear and convincing evidence that Samsung’s asserted utility**
6 **patent claims are invalid?**

7 ‘516 Patent (only as to obviousness)

8 Claim 15: Yes _____ (for Apple) No _____ (for Samsung)

9 Claim 16: Yes _____ (for Apple) No _____ (for Samsung)

10 ‘941 Patent (on all bases)

11 Claim 10: Yes _____ (for Apple) No _____ (for Samsung)

12 Claim 15: Yes _____ (for Apple) No _____ (for Samsung)

13 ‘711 Patent (only as to obviousness)

14 Claim 9: Yes _____ (for Apple) No _____ (for Samsung)

15 ‘893 Patent (on all bases)

16 Claim 10: Yes _____ (for Apple) No _____ (for Samsung)

17 ‘460 Patent (only as to obviousness)

18 Claim 1: Yes _____ (for Apple) No _____ (for Samsung)

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20 **DAMAGES TO SAMSUNG FROM APPLE**

21 **28. What is the dollar amount that Samsung is entitled to receive from Apple for**
22 **Samsung’s utility patent infringement claims on the ‘516 and ‘941 patents?**

23 \$ _____.

24 **29. What is the dollar amount that Samsung is entitled to receive from Apple for**
25 **Samsung’s utility patent infringement claims on the ‘711, ‘893, and ‘460 patents?**

26 \$ _____.

FINDINGS ON APPLE’S COUNTERCLAIMS AGAINST SAMSUNG

BREACH OF CONTRACT CLAIMS AND ANTITRUST

30. Has Apple proven that Samsung breached its contractual obligations by failing to timely disclose its intellectual property rights (“IPR”) during the creation of the UMTS standard or by failing to license its “declared essential” patents on fair, reasonable, and non-discriminatory (“FRAND”) terms?

Yes _____ (for Apple) No _____ (for Samsung)

31. Has Apple proven that Samsung has violated Section 2 of the Sherman Antitrust Act by monopolizing one or more technology markets related to the UMTS standard?

Yes _____ (for Apple) No _____ (for Samsung)

32. If you answered “Yes” to Question No. 30 or Question No. 31, what is the dollar amount that Apple is entitled to receive from Samsung for Samsung’s antitrust violation and/or breach of contract?

\$ _____.

PATENT EXHAUSTION

33. Has Apple proven by a preponderance of the evidence that Samsung is barred by patent exhaustion from enforcing the following Samsung patents against Apple?

(Please answer in each cell with a “Y” for “yes” (for Apple), or with an “N” for “no” (for Samsung).)

Samsung Patent	Exhaustion
‘516 Patent	
‘941 Patent	

Have the presiding juror sign and date this form.

Signed: _____

Date: _____

PRESIDING JUROR