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

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

25 Defendant.

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF VICTORIA F.  
MAROULIS IN SUPPORT OF  
SAMSUNG'S MOTION TO SHORTEN  
TIME**

1 I, Victoria F. Maroulis, declare as follows:

2 1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,  
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung  
4 Telecommunications America, LLC (collectively, “Samsung”). I submit this declaration in  
5 support of Samsung’s Motion To Dissolve The June 26, 2012 Preliminary Injunction (“Motion to  
6 Dissolve”). I have personal knowledge of the facts set forth in this declaration and, if called upon  
7 as a witness, I could and would testify to such facts under oath.

8 2. On August 26, 2012, I contacted counsel for Apple via email in order to propose a  
9 shortened briefing schedule whereby Samsung would file its Motion to Dissolve by August 27,  
10 Apple would file its opposition by August 28, Samsung would not file a reply, and the Court  
11 would rule on Samsung’s Motion to Dissolve without oral argument. Apple responded to my  
12 message on the evening of August 26 indicating that it would oppose a shortened briefing  
13 schedule.

14 3. The relief requested in Samsung’s Motion to Shorten Time is necessary because the  
15 jury verdict expressly rejects the basis upon which the preliminary injunction was entered—that  
16 Apple was likely to prove that Samsung’s Galaxy Tab 10.1 infringes the D’889 patent. The  
17 normal briefing and hearing schedule would prolong the injunction to which Samsung already has  
18 been subject for two months. Expedited resolution of Samsung’s Motion to Dissolve is also  
19 warranted in light of Samsung’s pending appeal of the June 26, 2012 preliminary injunction.  
20 Samsung’s opening brief in the Federal Circuit is due next Tuesday, September 4, 2012.  
21 Dissolving the preliminary injunction (or issuing an indicative ruling pursuant to Fed. R. Civ. P.  
22 62.1) prior to that date would allow Samsung to withdraw its appeal before having to file a merits  
23 brief on an appeal that will soon become moot.

24 4. Prior time modifications are described in prior motions to shorten time. *See* Docket  
25 Nos. 1393, 1389, 1259, 1146, 952 and 738.

26 5. The present request to shorten the briefing and hearing schedule on Samsung’s  
27 Motion for Stay will not affect the schedule of the case.

28

1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct.

3 Executed on August 26, 2012, at Palo Alto, California.

4  
5 /s/ Victoria F. Maroulis  
6 Victoria F. Maroulis  
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