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13 Attorneys for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and Samsung
14 Telecommunications America, LLC

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

17 APPLE INC., a California corporation,

18 Plaintiff,

19 vs.

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

24 Defendants.
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF BRETT ARNOLD
IN SUPPORT OF SAMSUNG'S PROFFER
OF WITNESS TESTIMONY AND
EXHIBITS**

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1 I, Brett Arnold, declare as follows:

2 1. I am an attorney 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 Proffer of Witness Testimony and Exhibits. I have personal knowledge of
6 the facts set forth in this declaration and, if called upon as a witness, I could and would testify to
7 such facts under oath.

8 2. Attached hereto as Exhibit A is a true a correct copy of excerpts from the April 24,
9 2012 Deposition Transcript of Peter Bressler.

10 3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
11 February 23, 2012 Deposition Transcript of Greg Joswiak.

12 4. Attached hereto as Exhibit C is a true and correct copy of a trademark application
13 filed by Apple Inc., produced in this action as SAMNDCA00404139-SAMNDCA00404665 and
14 marked in this action as DX 628.

15 5. Attached hereto as Exhibit D is a true and correct copy of U.S. Design Patent
16 D638,815.

17 6. Attached hereto as Exhibit E is a true and correct copy of U.S. Design Patent
18 D558,757.

19 7. Attached hereto as Exhibit F is a true and correct copy of U.S. Design Patent
20 D615,083.

21 8. Attached hereto as Exhibit G is a true and correct copy of U.S. Design Patent
22 D645,435.

23 9. Attached hereto as Exhibit H is a true and correct copy of U.S. Design Patent
24 D652,813.

25 10. Attached hereto as Exhibit I is a true and correct copy of U.S. Design Patent
26 D580,387.

27 11. Attached hereto as Exhibit J is a true and correct copy of U.S. Design Patent
28 D629,799.

1 12. Attached hereto as Exhibit K is a true and correct copy of U.S. Patent Pub. No.
2 2004/0041504 A1 and marked in this action as DX 678.

3 13. Attached hereto as Exhibit L is a true and correct copy of “MPCP Project 2006,”
4 produced in this action as SAMNDC00321382-SAMNDC00321427, and marked in this action as
5 DX 522.

6 14. Attached hereto as Exhibit M is a true and correct copy of “IReen Interaction
7 Design,” produced in this action as SAMNDC00321539-SAMNDC00321599, and marked in this
8 action as DX 566.

9 15. Attached hereto as Exhibit N is a true and correct copy of “Master Popular
10 Communication Piece,” produced in this action as SAMNDC00321659-SAMNDC00321679 and
11 marked in this action as DX 596.

12 16. Attached hereto as Exhibit O is a true and correct copy of “Master Popular
13 Communication Piece,” produced in this action as SAMNDC00321707-SAMNDC00321766 and
14 marked in this action as DX 625.

15 17. Attached hereto as Exhibit P is a true and correct copy of Korean Patent No. 30-
16 0452985, produced in this action as SAMNDCA00255357-365, and marked as Joint Trial Exhibit
17 No. 1086.

18 18. Attached hereto as Exhibit Q is a true and correct copy of Patent Application No.
19 29/382,846, produced in this action as APLNDC-Y0000307694-APLNDC-Y0000309349, and
20 marked in this action as DX 743.

21 19. Attached hereto as Exhibit R is a true and correct copy of Samsung’s “Next Big
22 Thing” advertisements, produced in this action as SAMNDCA00311579-SAMNDCA00311586
23 and SAMNDCA00312556-SAMNDCA00312565, and marked in this action as DX 629.

24 20. Attached hereto as Exhibit S is a true and correct copy of excerpts from the
25 February 15, 2012 Deposition Transcript of Christopher Stringer in International Trade
26 Commission Investigation Number 337-TA-796.

27 21. Attached hereto as Exhibit T is a true and correct copy of Apple’s Amended
28 Objections and Responses to Samsung’s Interrogatory No. 5.

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22. Exhibit U is intentionally omitted.

23. Exhibit V is intentionally omitted.

24. Attached hereto as Exhibit W is a true and correct copy of the sworn witness statement of Hyoung Shin Park, dated May 3, 2012, which was submitted to the United States International Trade Commission in the Matter of Certain Electronic Digital Media Devices and Components Thereof, Investigation No. 337-TA-796.

25. Attached hereto as Exhibit X is a true and correct copy of demonstrative exhibits Apple displayed in its opening statement which purport to show Samsung smartphones before and after Apple announced the iPhone in January 2007.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Jose, California on August 21, 2012.

By /s/ Brett Arnold
Brett Arnold

