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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 PROFFER OF WITNESS  
TESTIMONY AND EXHIBITS**

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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 of 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 1 is a true and correct copy of the Expert Report of Jeffrey Johnson, Ph.D. Regarding Non-Infringement of U.S. Patent No. 7,469,381.

3. Manually filed herewith as Exhibit 2 is a true and correct copy of Samsung source code bearing the bates stamps SAMNDCA-C00000613-1391; SAMNDCA-C00001450-1526; SAMNDCA-C00001528-1908; SAMNDCA-C00001911-2265; SAMNDCA-C00002358-2476; SAMNDCA-C00002481-2529; SAMNDCA-C00002559-2899; SAMNDCA-C00002901-2975; SAMNDCA-C00003054-3555; SAMNDCA-C00003597-4086; SAMNDCA-C00004088-4416; SAMNDCA-C00004451-4524; and SAMNDCA-C00007811-8031.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the April 26, 2012 Deposition Transcript of Jeffrey Johnson.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the January 12, 2012 Deposition Transcript of Woogyun Kho.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the March 8, 2012 Deposition Transcript of Ioi Kim Lam.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the March 4, 2012 Deposition Transcript of Woogyun Kho.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the February 8, 2012 Deposition Transcript of Sun Young Yi.

9. Attached hereto as Exhibit 8 is a true and correct copy of an excerpt from Samsung’s Supplemental Responses to Apple’s Interrogatory No. 16, dated March 8, 2012.

1           10.     Manually filed herewith as Exhibit 9 is a true and correct copy of PX 66, a  
2 demonstrative created by Apple’s expert Karan Singh, which includes a video demonstrating the  
3 “blue glow” functionality.

4           11.     Manually filed herewith as Exhibit 10 is a true and correct copy of DX  
5 2557, a demonstrative created by Samsung, which includes a video demonstrating the “blue glow”  
6 functionality.

7           12.     Attached hereto as Exhibit 11 is a true and correct public copy of the Initial  
8 Determination on Violation of Section 337 and Recommended Determination on Remedy and  
9 Bond.

10          13.     Attached hereto as Exhibit 12 is a true and correct copy of U.S. Patent No.  
11 6,498,590.

12          14.     Attached hereto as Exhibit 13 is a true and correct copy of the Order  
13 Granting Request for Ex Parte Reexamination.

14          15.     Attached hereto as Exhibit 14 is a true and correct copy of excerpts from the  
15 Expert Report of David J. Teece, dated March 22, 2012.

16          16.     Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the  
17 April 19, 2012 Deposition Transcript of David J. Teece.

18          17.     Attached hereto as Exhibit 16 is a true and correct copy of DX 618.

19          18.     Attached hereto as Exhibit 17 is a true and correct copy of excerpts from the  
20 Expert Report of Eric Stasik, dated April 16, 2012.

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22                   Executed August 21, 2012, at San Jose, California.

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25 Diane C. Hutnyan