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15 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,
21 Plaintiff,
22 vs.
23 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
24 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
25 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,
26 Defendants.
27

CASE NO. 11-cv-01846-LHK
**DECLARATION OF B. DYLAN
PROCTOR IN SUPPORT OF
SAMSUNG'S MOTION ON NON-JURY
CLAIMS, INCLUDING
INDEFINITENESS**

Date: December 6, 2012
Time: 1:30 pm
Place: Courtroom 8, 4th Floor
Judge: Hon. Lucy H. Koh

1 I, B. Dylan Proctor, 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 on Non-Jury Claims, Including Indefiniteness. I have personal
6 knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and
7 would testify to such facts under oath.
- 8 2. Attached hereto as Exhibit 1 is a true and correct copy of Joint Trial Exhibit No.
9 1046.
- 10 3. Attached hereto as Exhibit 2 is a true and correct copy of Joint Trial Exhibit No.
11 1049.
- 12 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from Volume 3
13 of the Trial Transcript, Pages 556-930, dated August 3, 2012.
- 14 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from Volume 6
15 of the Trial Transcript, Pages 1638-1988, dated August 10, 2012.
- 16 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from Volume 9
17 of the Trial Transcript, Pages 2651-2965, dated August 15, 2012.
- 18 7. Attached hereto as Exhibit 6 is a true and correct copy of Joint Trial Exhibit No.
19 1040.
- 20 8. Attached hereto as Exhibit 7 is a true and correct copy of Joint Trial Exhibit No.
21 1041.
- 22 9. Attached hereto as Exhibit 8 is a true and correct copy of Joint Trial Exhibit No.
23 1042.
- 24 10. Attached hereto as Exhibit 9 is a true and correct copy of Joint Trial Exhibit No.
25 1043.
- 26 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the
27 transcript of the hearing held in this matter on July 24, 2012.
- 28

1 12. Exhibit 11 is Joint Trial Exhibit 1005, which is a physical object and is in the
2 Court's files. (See Dkt. No. 1947.)

3 13. Attached hereto as Exhibit 12 is a true and correct copy of Defendants' Trial
4 Exhibit No. 741.

5 14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from Volume 2
6 of the Transcript of Proceedings ("Trial Transcript"), Pages 283-555, dated July 31, 2012.

7 15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from Volume
8 11 of the Trial Transcript, Pages 3387-3711, dated August 17, 2012.

9 16. Attached hereto as Exhibit 15 is a true and correct copy of Defendants' Trial
10 Exhibit No. 810.

11 17. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from Volume 4
12 of the Trial Transcript, Pages 931-1296, dated August 6, 2012.

13 18. Attached hereto as Exhibit 17 is a true and correct copy of Plaintiff's Trial Exhibit
14 No. 52.

15 19. Attached hereto as Exhibit 18 is a true and correct copy of Defendants' Trial
16 Exhibit No. 800.

17 20. Attached hereto as Exhibit 19 is a true and correct copy of Defendants' Trial
18 Exhibit No. 801.

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20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed on the 21th of September, 2012, in Los Angeles, California.

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B. Dylan Proctor

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