# **Exhibit U**

	Case5:11-cv-01846-LHK Document2017-	12 Filed10/02/12 Page2 of 5		
1 2 3 4 5 6 7 8 9 10 11 12 13	QUINN EMANUEL URQUHART & SULLIVA Charles K. Verhoeven (Cal. Bar No. 170151) charlesverhoeven@quinnemanuel.com 50 California Street, 22 <sup>nd</sup> Floor San Francisco, California 94111 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Kevin P.B. Johnson (Cal. Bar No. 177129) kevinjohnson@quinnemanuel.com Victoria F. Maroulis (Cal. Bar No. 202603) victoriamaroulis@quinnemanuel.com 555 Twin Dolphin Drive 5 <sup>th</sup> Floor Redwood Shores, California 94065 Telephone: (650) 801-5000 Facsimile: (650) 801-5000 Michael T. Zeller (Cal. Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (213) 443-3100 Attorneys for SAMSUNG ELECTRONICS	N, LLP		
14 15	CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC			
16	UNITED STATES	DISTRICT COURT		
17		LIFORNIA, SAN JOSE DIVISION		
18	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK		
19	Plaintiff,			
20	vs.	SAMSUNG'S AMENDED IDENTIFICATION OF CUSTODIANS,		
21	SAMSUNG ELECTRONICS CO., LTD., a	LITIGATION HOLD NOTICES AND SEARCH TERMS		
22	Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New			
23	York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA,	HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY		
24	LLC, a Delaware limited liability company, Defendants.			
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		Case No. 11-cv-01846-LHK		

Pursuant to the Court's September 28, 2011 Order, Defendants and Counterclaimants
Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
Telecommunications America, LLC (collectively "Samsung") hereby serve the following
identifications of custodians, litigation hold notices and discovery search terms. Disclosure of
the below document collection information and the attached exhibits pursuant to the Court's Order
does not constitute waiver of attorney client, work product, or any other applicable privilege.

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### **LITIGATION HOLD NOTICES**

#### SEC Litigation Hold Notices

11 12		Litigation Notice (exhibit)	Date of Litigation Notice	Language	Recipients
12		A	8-23-2010	English	See Exhibit S
14		В	9-3-2010	Korean	See Exhibit S
15		С	4-21-2011	English	All SEC custodians (approximately 2,841 individuals)
16		D	4-21-2011	Korean	All SEC custodians (approximately 2,841 individuals)
17		E	5-11-2011	English	All SEC custodians (approximately 2,841 individuals)
18		F	5-11-2011	Korean	All SEC custodians (approximately 2,841 individuals)
19		G	7-11-2011	English	All SEC custodians (approximately 2,841 individuals)
20		Н	7-12-2011	Korean	All SEC custodians (approximately 2,841 individuals)
21		I	5-18-2011	Korean	See Exhibit T
22		J	7-18-2011	Korean	See Exhibit T
23		STA Litigati	on Hold Notices		
24	STA Litigation Hold Notices				

25	К	4-20-2011	English	All STA personnel including contractors and dispatchers (approximately 2,243 individuals)
26 27	L	4-25-2011	English	All STA personnel including contractors and dispatchers
27	М	7-8-2011	English	(approximately 2.243 individuals) See Exhibit U

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Ν	5-25-2011	English	All STA personnel including contractors and dispatchers (approximately 2,243 individuals)

#### SEA Litigation Hold Notices

0	4-21-2011	English	All SEA personnel (approximately 850 individuals)
Р	4-21-2011	Korean	All SEA personnel (approximately 850 individuals)
Q	6-20-2011	English	All SEA personnel (approximately 850 individuals)
R	7-8-2011	English	All SEA personnel (approximately 850 individuals)

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# 11 SEARCH TERMS USED IN DISCOVERY

Documents Subject to Search Term	Search Terms
Emails from Jinsoo Kim; Jung Min Yeo; Minhyouk Lee;	Apple or 애플 or A 사 or A 社 or A4 or A Company or iPhone or 아이폰 or iPad
GiYoung Lee; Yongseok Bang; Bo-ra Kim; Yunjung Lee	or 아이희드 or Infuse or Dempsey or Galaxy or Behold or Vibrant or Droid Charge or Stealth or P4 or P5
Other (non-email) documents	Each document was reviewed manually;
collected from Jinsoo Kim; Jung Min Yeo; Minhyouk Lee; GiYoung Lee; Yongseok Bang;	AND
Bo-ra Kim; Yunjung Lee.	The following search terms also were used to
	ensure that documents including these terms were not inadvertently missed during the manual review:
	Apple or 애플 or A 사 or A 社 or A4 or A Company or iPhone or 아이폰 or iPad or 아이패드
	AND
	The following search terms also were run again on these custodians' hard drives and email
	accounts to ensure that documents including these terms were not inadvertently missed during
	the prior two reviews:
	iPhone or 아이폰 or iPad or 아이패드
	-2 Case No. 11-cv-018
Samsung's Amended Id	dentification of Custodians, Litigation Hold Notices, and Search

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1					
2	Custodial Files (ie. Entire Hard Drive and Email Account)	Search Terms			
3	Subject to Search Term				
4	Jeeyeun Wang; Ahyoung Kim; Min Kyung Kim; SeungHun Yoo.	iPhone or 아이폰 or iPad or 아이패드			
5					
6	Jaegwan Shin; Ioi Lam; Qi Ling	Apple or A Company or 애프 or A 사 or A 社			
7	Jacgwan Shin, 101 Lani, Qi Ling	Apple or A Company or 애플 or A 사 or A 社 or A4 or iPhone or 아이폰 or iPad or 아이패드 or "bounce effect"			
8	Wookyun Kho; Kihyung Nam; Dooju Byun	iPhone or 아이폰 or iPad or 아이패드 and bounce or 바운스			
9	Sungwook Kwon	iPhone or 아이폰 or iPad or 아이패드 or Infuse or Galaxy or Droid Charge or Tab 10.1			
10					
11	Don Joo Lee*	iPhone or 아이폰 or iPad or 아이패드 or redesign or 재디자인 or "design change" or			
12	*Date restriction of March 2 to March 31, 2011 applied	redesign or 재디자인 or "design change" or "디자인 변경" or Galaxy Tab or design or 디자인 or P3 or P4			
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14	CUSTODIANS				
15	A list of all custodians is attached as Amended Exhibit V.				
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17	DATED: October 10, 2011				
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	Samsung's Amended Id	-3- Case No. 11-cv-01846-LHK dentification of Custodians, Litigation Hold Notices, and Search Terms			