

# **EXHIBIT 1**

**FILED UNDER SEAL**

1 HAROLD J. MCELHINNY (CA SBN 66781)  
hmcclhinny@mofo.com  
2 MICHAEL A. JACOBS (CA SBN 111664)  
mjacobs@mofo.com  
3 RICHARD S.J. HUNG (CA SBN 197425)  
rhung@mofo.com  
4 MORRISON & FOERSTER LLP  
425 Market Street  
5 San Francisco, California 94105-2482  
Telephone: (415) 268-7000  
6 Facsimile: (415) 268-7522

7  
8 Attorneys for Plaintiff  
APPLE INC.

MARK D. SELWYN (SBN 244180)  
mark.selwyn@wilmerhale.com  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
950 Page Mill Road  
Palo Alto, California 94304  
Telephone: (650) 858-6000  
Facsimile: (650) 858-6100

WILLIAM F. LEE (*pro hac vice* anticipated)  
william.lee@wilmerhale.com  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 526-6000  
Facsimile: (617) 526-5000

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION

14  
15 APPLE INC., a California corporation,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., a  
Korean corporation; SAMSUNG  
19 ELECTRONICS AMERICA, INC., a New  
York corporation; and SAMSUNG  
20 TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company,

21 Defendants.  
22

Case No. 11-cv-01846-LHK

**APPLE INC.'S REQUESTS FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS RELATING TO  
APPLE'S MOTION FOR A  
PRELIMINARY INJUNCTION – SET  
TWO**

1 that allows for a list that is scrolled beyond its terminus to scroll back or bounce back into place  
2 or for a document that is translated beyond its edge to translate back or bounce back so that the  
3 list or document returns to fill the screen.

4 **REQUEST NO. 205:**

5 All Documents relating to any statements made by you regarding Apple and the Products  
6 at Issue.

7 **REQUEST NO. 206:**

8 All Documents relating to any customer surveys, studies, analyses or investigations  
9 regarding the Products at Issue.

10 **REQUEST NO. 207:**

11 All Documents identifying or analyzing the market or markets to which Samsung intends  
12 to sell the Products at Issue.

13 **REQUEST NO. 208:**

14 All Documents created within the last five years relating to Samsung's actual or projected  
15 smartphone market share.

16 **REQUEST NO. 209:**

17 All Documents created within the last five years relating to Samsung's actual or projected  
18 tablet computer market share.

19 **REQUEST NO. 210:**

20 All Documents created between 2008 and the present relating to Samsung's expansion of  
21 its U.S. market share for smartphones and tablet computers.

22 **REQUEST NO. 211:**

23 All Documents relating to the development of the Products at Issue that mention or refer  
24 to Apple or Apple products, including communications among or with your personnel that discuss  
25 whether or how to copy any design, feature, or function of an Apple product. Documents  
26 responsive to this Request include, but are not limited to, Documents related to the redesign of the  
27 Products at Issue in light of Apple products.

28 **REQUEST NO. 212:**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: August 26, 2011

MORRISON & FOERSTER LLP

By: /s/ Richard S.J. Hung

RICHARD S.J. HUNG

Attorneys for Defendant  
APPLE INC.