Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page1 of 16

# EXHIBIT W FILED UNDER SEAL

#### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page2 of 16

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Writer's Direct Contact 415.268.6024 MMazza@mofo.com

November 15, 2011

Via E-Mail (rachelkassabian@quinnemanuel.com)

Rachel Herrick Kassabian Quinn Emanuel Urquhart & Sullivan, LLP 555 Twin Dolphin Drive, 5th Floor Redwood Shores, CA 94065-2139

Re: Apple v. Samsung, Case No. 11-cv-1846-LHK (PSG) (N.D. Cal.)

Dear Rachel:

Enclosed is a corrected version of Apple's November 7, 2011 search terms disclosure. This disclosure corrects certain date cutoffs as discussed in recent correspondence.

As with the original November 7, 2011 search terms disclosure, this information covers documents produced by Apple via Morrison & Foerster in connection with the claims being pursued by Apple. It does not cover documents recently produced by Apple via Wilmer Hale in connection with the claims being pursued by Samsung. Those search terms will be covered in Apple's next monthly disclosure.

Sincerely,

/s/ Mia Mazza

Mia Mazza

Encl.

cc: Samuel Maselli Peter J. Kolovos S. Calvin Walden

# Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page3 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Search Terms Applied by Apple November 7, 2011 CORRECTED

9
None
10
None
None
None
None
1
1
2, 10
None
1
8
None
None
9
9
4
1
None
6
5
9
7
9
8
9
None
5
1
8
None
3
6
None

Custodian Produced	Keyword List Applied
Rohrbach, Matthew	9
Russell-Clarke, Peter	9
Server, casket.ecs.apple.com	None
Sewell, Bruce	8
Strickon, Josh	7
Stringer, Chris	9
Twiggs, Sissie	None
USPTO	None
Van Os, Marcel	1
Westerman, Wayne	4
Whang, Eugene	9
Williamson, Richard	1
Woodring, Cooper	None
Zorkendorfer, Rico	9

### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page4 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Search Terms Applied by Apple November 7, 2011 CORRECTED

Search Term List	Date Limitation
1	On or before September 30, 2007
2	On or before September 30, 2007 or February 28, 2008 (see list)
	On or before September 30, 2007,
3	December 31, 2007, or February 28,
	2008 (see list)
4	On or before June 29, 2007
5	On or before June 29, 2007
6	On or before June 29, 2007
7	On or before June 29, 2007
8	January 1, 2010 to April 26, 2011
9	June 1, 2003 to April 30, 2011
10	October 1, 2004 to April 30, 2011

"blow up" "double tap to zoom" "double tap" "double tap" near/2 zoom "re size" "smart zoom" "structured document" "invention disclosure statement" ("structured document" or "web page" or webpage or html) and ((enlarg\* or zoom or "blow up" or expand or center or focus) near/10 (tap or press or click or select)) ("web page" or webpage) near/10 (enlarg\* or zoom or "blow up" or center or focus or shrink or resize) blow near/2 up blowup double near/2 tap doubletap enlarg\* expand\* IDS invention near/3 disclosure resize shrink smart near/2 zoom structured near/2 document zoom

### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page6 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 2 CORRECTED

Term	Upper Date Limit
"blow up"	September 30, 2007
"double tap to zoom"	September 30, 2007
"double tap"	September 30, 2007
"double tap" near/2 zoom	September 30, 2007
"pop up"	February 28, 2008
"pop-up"	February 28, 2008
"re size"	September 30, 2007
"smart zoom"	September 30, 2007
"structured document"	September 30, 2007
"invention disclosure statement"	February 28, 2008
"on screen display", "on-screen display", "onscreen display"	February 28, 2008
blow near/2 up	September 30, 2007
blowup	September 30, 2007
disappear	February 28, 2008
double near/2 tap	September 30, 2007
doubletap	September 30, 2007
enlarg*	September 30, 2007
expand*	September 30, 2007
fade	February 28, 2008
faded	February 28, 2008
fading	February 28, 2008
HUD	February 28, 2008
IDS	February 28, 2008
invention near/3 disclosure	February 28, 2008
onscreen, "on-screen" near/2 display	February 28, 2008
OSD	February 28, 2008
рорир	February 28, 2008
resize	September 30, 2007
shrink	September 30, 2007
smart near/2 zoom	September 30, 2007
structured near/2 document	September 30, 2007
translucent	February 28, 2008
zoom	September 30, 2007

# Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page7 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 2 CORRECTED

Term	Upper Date Limit
("structured document" or "web page" or webpage or html) and ((enlarg* or zoom or "blow up" or expand or center or focus) near/10	
(tap or press or click or select))	September 30, 2007
("web page" or webpage) near/10 (enlarg* or zoom or "blow up" or center or focus or shrink or resize)	September 30, 2007
((display) near/5 (dialog or window)) and ((timed, times) near/10 (elapse* or reachi* or reache* or pass or expiri* or expire* or expirat* or past or after))	February 28, 2008
((display) near/5 (dialog or window)) and ((automatic*) near/5 (close or terminate or remove or hide))	February 28, 2008
((display) near/5 (pop-up)) and ((timed, times) near/10 (elapse* or reachi* or reache* or pass or expiri* or expire* or expirat* or past or after))	February 28, 2008
((display) near/5 (pop-up)) and ((automatic*) near/5 (close or terminate or remove or hide))	February 28, 2008
((user) near/3 (interface)) and ((display) near/5 (alert or warning or information*)) and ((timer) near/10 (elasp* or reach* or pass or expir* or past or after))	February 28, 2008
((user) near/3 (interface)) and ((display) near/5 (alert or warning or information*)) and (temporary or momentary)	February 28, 2008

### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page8 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 3 CORRECTED

Term	Upper Date Limit
381	December 30, 2007
7469381	December 30, 2007
"7,469,381"	December 30, 2007
"Big Demo"	December 30, 2007
"blow up"	September 30, 2007
"Bounc* back"	December 30, 2007
"Damp* motion"	December 30, 2007
"Document translation"	December 30, 2007
"double tap to zoom"	September 30, 2007
"double tap"	September 30, 2007
"double tap" near/2 zoom	September 30, 2007
•	December 30, 2007
"List scrolling"	
"Momentum scrolling"	December 30, 2007
"pop up"	February 28, 2008
"pop-up"	February 28, 2008
"re size"	September 30, 2007
"smart zoom"	September 30, 2007
"Spring* back"	December 30, 2007
"structured document"	September 30, 2007
"Value tuning"	December 30, 2007
"invention disclosure statement"	February 28, 2008
"on screen display", "on-screen display", "onscreen display"	February 28, 2008
(Portion)	December 30, 2007
Beyers	December 30, 2007
Big near/2 Demo	December 30, 2007
blow near/2 up	September 30, 2007
blowup	September 30, 2007
Bounc*	December 30, 2007
Bounc* near/2 back	December 30, 2007
Damp*	December 30, 2007
Damp* near/2 motion	December 30, 2007
disappear	February 28, 2008
Document near/2 translation	December 30, 2007
double near/2 tap	September 30, 2007
doubletap	September 30, 2007
Elastic	December 30, 2007
enlarg*	December 30, 2007
expand*	December 30, 2007
fade	February 28, 2008
faded	February 28, 2008
fading	February 28, 2008
Fling*	December 30, 2007
Flung	December 30, 2007
HUD	February 28, 2008
IDS	December 30, 2007
invention near/3 disclosure	February 28, 2008

#### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page9 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 3 CORRECTED

Term	Upper Date Limit
List near/2 scrolling	December 30, 2007
M68	December 30, 2007
Momentum near/2 scrolling	December 30, 2007
onscreen, "on-screen" near/2 display	February 28, 2008
OSD	February 28, 2008
рорир	February 28, 2008
Purple	December 30, 2007
resize	December 30, 2007
Rubber	December 30, 2007
Rubber Band*	December 30, 2007
Rubber near/2 Band*	December 30, 2007
Rubber-Band*	December 30, 2007
shrink	September 30, 2007
smart near/2 zoom	September 30, 2007
Snap	December 30, 2007
Spring*	December 30, 2007
Spring* near/2 back	December 30, 2007
structured near/2 document	September 30, 2007
Translat*	December 30, 2007
translucent	February 28, 2008
Value near/2 tuning	December 30, 2007
zoom	September 30, 2007
("structured document" or "web page" or webpage or html) and ((enlarg* or zoom or "blow up" or expand or center or focus) near/10 (tap or press or click or select)) ("web page" or webpage) near/10 (enlarg* or zoom or "blow up" or center or focus or shrink or resize)	September 30, 2007 September 30, 2007
((display) near/5 (dialog or window)) and ((timed, times) near/10 (elapse* or reachi* or reache* or pass or expiri* or expire* or expirat* or past or after))	February 28, 2008
((display) near/5 (dialog or window)) and ((automatic*) near/5 (close or terminate or remove or hide))	February 28, 2008
((display) near/5 (pop-up)) and ((timed, times) near/10 (elapse* or reachi* or reache* or pass or expiri* or expire* or expirat* or past or after))	February 28, 2008
((display) near/5 (pop-up)) and ((automatic*) near/5 (close or terminate or remove or hide))	February 28, 2008
((user) near/3 (interface)) and ((display) near/5 (alert or warning or information*)) and ((timer) near/10 (elasp* or reach* or pass or expir* or past or after))	February 28, 2008
((user) near/3 (interface)) and ((display) near/5 (alert or warning or information*)) and (temporary or momentary)	February 28, 2008

"eigen value" "eigen vector" "touch panel" "touch screen" "invention disclosure statement" ("multi-touch" or multitouch) near/15 (screen or panel or sensor) (contract) near/15 (tracking OR identification) near/15 (module) (distinguish\*) near/15 (multi-touch or multitouch) (distinguish\*) near/15 (touch OR finger OR hand OR palm OR cheek) (track\*) near/15 (ellipse OR parameter OR path) calibration near/3 module eccentric\* eigen-value eigen-vector eigenvalue eigenvector ellipse IDS invention near/3 disclosure pixel\* position near/15 sens\* touch-panel touch-screen touchpanel touchscreen (ellipse) near/15 (fit\* OR parameter) (ellipse) near/15 (pixel OR group OR finger OR touch OR image OR proximity) (finger or thumb or palm or hand) near/50 (detect or sens\* or track\*) (point\* or pixel\* or dot) near/15 (group or form\* or shape or bunch) (segment\*) near/15 (multi-touch OR multitouch) (segment\*) near/15 (pixel OR group OR image OR proximity OR finger OR touch)

(ellipse OR axis OR radius OR orientation OR eccentricity) near/15 (eigenvalue OR eigenvector OR covariance)

"indium tin oxide" "liquid crystal display" "touch panel" "touch screen" "V com" "invention disclosure statement" (electric\*) near/10 (isolat\*) near/10 (LCD OR display OR Vcom drive OR sense OR trace) (layer or overlay or sandwich) near/50 (traces or conduct\* or line\* or ITO) (multi-touch or multitouch) near/10 (screen or panel or sensor) (shield\*) near/10 (drive OR sense OR trace OR LCD OR Vcom OR display) (trace or conduct\* or line or ITO) near/50 (wid\* or thick\* or large) (trace) near/10 (drive OR sense OR width) (transparent) near/10 (sensor) capacitive capacitive near/10 coupling capacitive near/10 sensing IDS indium interference invention near/3 disclosure ITO LCD mutually near/10 capacitive noise position near/10 sens\* sense near/50 drive shield\* signal touch-panel touch-screen touchpanel touchscreen touchscreen near/10 electric\* near/10 isolat\* touchscreen near/10 shield transparent near/10 conduct\* transparent near/10 touch\* V-com Vcom

#### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page12 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 6

"touch display" "touch screen" "touch-sensitive display" "invention disclosure statement" bounc\* displacement Drag\* elastic finger Flick\* gesture IDS invention near/3 disclosure pinch\* pre-determined predetermined rotate rubber rubber near/2 band rubber-band rubberband scale scoll-indicator scroll indicator scroll near/2 bar scroll near/2 indicator scroll-bar Scroll\* Scrollbar Sweep\* Swipe touch near/2 display touch near/2 screen touch-screen touch-sensitive near/2 display touchscreen twist\* zoom\*

"touch screen" touchscreen touch-screen "touch panel" touchpanel touch-panel position near/10 sens\* capacitive near/10 sensing mutually near/10 capacitive capacitive near/10 coupling sense near/50 drive transparent near/10 conduct\* transparent near/10 touch\* "indium tin oxide" ITO indium capacitive "invention disclosure statement" IDS invention near/3 disclosure (transparent) near/10 (sensor) (multi-touch or multitouch) near/10 (screen or panel or sensor) (layer or overlay or sandwich) near/50 (traces or conduct\* or line\* or ITO)

# Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page14 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 8

Scarlet Galaxy 19000 Seongwoo Kim Seong Woo Kim Jongsun Park Jong Sun Park Seungho Ahn Seung Ho Ahn Dr. Ahn Yongtae Lee Yong-Tae Lee Yong Tae Lee JY Lee J.Y. Lee Jay Lee Jay Y. Lee KJ Kim K. J. Kim [emails sent to or received from an email address ending in] "samsung.com"

#### Case5:11-cv-01846-LHK Document2021-19 Filed10/02/12 Page15 of 16

Apple v. Samsung Case No. C 11-1846 LHK (PSG) Apple Search Terms November 7, 2011 List 9

iPhone iPad M68 M68X N82 sterling N88 calico N90 trooper N92 "iPod touch" N72 N45 N72B N72C N18 N81 Q67 Q79 K48 K48M K93 K94 K95 Diablo granite purgatory vanquish

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (oval or ovular or oblong or lozeng\* near/10 speaker)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (bezel)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (rectangular or rectangle near/10 round\* or curve\* near/10 front or face or screen or display)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (screen or display near/10 center\* or middle)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (screen or display near/20 border\* or edge or edging)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (clear or transparen\* or translucen\* near/10 front or surface or screen or display or face)

(iPhone or "iPod touch" or iPad or M68 or M68X or N82 or sterling or N88 or calico or N90 or trooper or N92 or "iPod touch" or N72 or N45 or N72B or N72C or N18 or N81 or Q67 or Q79 or K48 or K48M or K93 or K94 or K95 or Diablo or granite or purgatory or vanquish) and (round\* or curv\* or soft or smooth near/10 edge\*)

#### ornamental

alternat\* near/5 (idea or design)

function\*