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15 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
17

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
20

21 APPLE INC., a California corporation,

22 Plaintiff,

23 vs.

24 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
25 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
26 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

27 Defendant.
28

CASE NO. 11-cv-01846-LHK

**DECLARATION OF VICTORIA
MAROULIS IN SUPPORT OF
SAMSUNG'S RESPONSE TO APPLE'S
BRIEF REGARDING NON-JURY
CLAIMS INCLUDING WAIVER,
EQUITABLE ESTOPPEL, UNCLEAN
HANDS, AND UNFAIR COMPETITION**

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

1 I, Victoria F. Maroulis, declare:

2 1. I am a partner with 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 have personal knowledge of the
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such
6 facts under oath.

7 2. I make this declaration in support of Samsung’s Response to Apple’s Brief
8 Regarding Non-Jury Claims including Waiver, Equitable Estoppel, Unclean Hands, and Unfair
9 Competition.

10 3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from Volume 10
11 of the Trial Transcript, Pages 2966-3386, dated August 16, 2012.

12 4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from Volume 11
13 of the Trial Transcript, Pages 3387-3711, dated August 17, 2012.

14 5. Attached hereto as **Exhibit 3** is a true and correct copy of Plaintiff’s Trial
15 Exhibit 74.

16 6. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiff’s Trial
17 Exhibit 80.

18 7. Attached hereto as **Exhibit 5** is a true and correct copy of Plaintiff’s Trial
19 Exhibit 122.

20 8. Attached hereto as **Exhibit 6** is a true and correct copy of Defendants’ Trial
21 Exhibit 549.

22 9. Attached hereto as **Exhibit 7** is a true and correct copy of Defendants’ Trial
23 Exhibit 613.

24 10. **Exhibit 8** consists of Defendants’ Trial Exhibit 630. Since the Court previously
25 granted third-party motions to seal the document (*see* Dkt. 1649 at 11 and Dkt. 1795), a true and
26 correct copy of a redacted version of Defendants’ Trial Exhibit 630 is attached to this filing.

27 11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from the Initial
28 Determination on Violation of Section 337 and Recommendation Determination on Remedy and

1 Bond (Public Version) in International Trade Commission investigation number 337-TA-794,
2 dated September 14, 2012.

3 12. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from the
4 transcript of the March 6, 2012 deposition of Jun Won Lee in International Trade Commission
5 investigation number 337-TA-794.

6 13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from Apple
7 Inc.'s Responses to Samsung's Third Set of Requests for Admission, dated March 2, 2012.

8
9 I declare under penalty of perjury that the foregoing is true and correct. Executed in
10 Redwood Shores, California on October 5, 2012.

11 /s/ Victoria F. Maroulis

12 Victoria F. Maroulis
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GENERAL ORDER ATTESTATION

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from John Pierce.

/s/ Victoria F. Maroulis

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