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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 APPLE INC., a California corporation,
21 Plaintiff,
22 vs.

CASE NO. 11-cv-01846-LHK

**REPLY DECLARATION OF JOHN M.
PIERCE IN SUPPORT OF MOTION ON
SAMSUNG'S NON-JURY CLAIMS**

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

1 I, John M. Pierce, 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 Reply in Support of Motion on Samsung's Non-Jury Claims, Including
6 Indefiniteness. I have personal knowledge of the facts set forth in this declaration and, if called
7 upon as a witness, I could and would testify to such facts under oath.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the April
9 26, 2012 deposition transcript of Karan Singh.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt from
11 Samsung's Patent Local Rule 3-3 and 3-4 Disclosures setting forth Samsung's invalidity
12 contentions with respect to the '163 patent.

13 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the
14 October 18, 2011 deposition transcript of Freddy Anzures.

15 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the October
16 27, 2011 deposition transcript of Daniel Coster.

17 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the March
18 23, 2012 deposition transcript of Kurt Dammerman, taken in *In the Matter of Certain Electronic*
19 *Digital Media Devices and Components Thereof*, U.S. Int'l Trade Comm'n Inv. No. 337-TA-796
20 (hereafter "ITC 796 Investigation").

21 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the October
22 21, 2011 deposition transcript of Daniele de Iuliis.

23 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the October
24 31, 2011 deposition transcript of Richard Howarth.

25 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the July 16,
26 2012 deposition transcript of Richard Howarth.

27 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the October
28 16, 2011 deposition transcript of Duncan Kerr.

1 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the
2 October 24, 2011 deposition transcript of Matthew Rohrbach.

3 12. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the
4 October 27, 2011 deposition transcript of Eugene Whang.

5 13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the
6 October 21, 2011 deposition transcript of Rico Zorkendorfer.

7 14. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the
8 February 23, 2012 deposition transcript of Matthew Rohrbach, taken in the ITC 796 Investigation.

9 15. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from the
10 February 17, 2012 deposition transcript of Eugene Whang, taken in the ITC 796 Investigation.

11 16. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the
12 February 8, 2012 deposition transcript of Richard Howarth, taken in the ITC 796 Investigation.

13 17. Attached hereto as Exhibit 16 is a true and correct copy of an Order Granting
14 Request For Ex Parte Application, issued by the U.S. Patent and Trademark Office in regards to
15 the '915 patent.

16 18. Attached hereto as Exhibit 17 is a true and correct copy of an Order Granting
17 Request For Ex Parte Application, issued by the U.S. Patent and Trademark Office in regards to
18 the '381 patent.

19

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 12th day of October, 2012, in Los Angeles, California.

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 /s/ John M. Pierce
John M. Pierce

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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that John M. Pierce has concurred in this filing.

/s/ Victoria Maroulis