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13 14 15	Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC	
16	UNITED STATES DISTRICT COURT	
17	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION	
18	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK (PSG)
19 20	Plaintiff, vs.	DECLARATION OF JOHN PIERCE IN SUPPORT OF SAMSUNG'S OPPOSITION
20	vs. SAMSUNG ELECTRONICS CO., LTD., a	TO APPLE'S MOTION TO COMPEL DEPOSITIONS OF SAMSUNG
21	Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New	DECLARANTS
23	York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA,	
24	LLC, a Delaware limited liability company,	
25	Defendants.	
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02198.51855/5027712.2	DECLARATION OF JOHN PIERCE IN SUPPORT O	Case No. 11-cv-01846-LHK (PSG) F SAMSUNG'S OPPOSITION TO APPLE'S MOTION TO COMPEL DEPOSITIONS OF SAMSUNG DECLARANTS

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1	I, JOHN 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 Opposition to Apple's Motion for a Permanent Injunction and Damages	
6	Enhancement. 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 an email sent on October	
9	22, 2012 at 10:38 a.m. from counsel for Apple to counsel for Samsung.	
10	3. Attached hereto as Exhibit 2 is a true and correct copy of an email sent on October	
11	19, 2012 at 2:54 p.m. from counsel for Apple to counsel for Samsung.	
12	4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Rebuttal	
13	Expert Report Of Stephen Gray dated April 16, 2012.	
14		
15	I declare under penalty of perjury under the laws of the United States that the foregoing is	
16	true and correct. Executed on the 26th day of October, 2012, in Los Angeles, California.	
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18	<u>/s/John Pierce</u>	
19	John Pierce	
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02198.51855/5027712.2	-1- Case No. 11-cv-01846-LHK (PSG) DECLARATION OF JOHN PIERCE IN SUPPORT OF SAMSUNG'S OPPOSITION TO APPLE'S MOTION TO	
	COMPEL DEPOSITIONS OF SAMSUNG DECLARANTS	

1	General Order 45 Attestation	
2	I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this	
3	Declaration. In compliance with General Order 45(X)(B), I hereby attest that John Pierce has	
4	concurred in this filing.	
5	<u>/s/ Victoria Maroulis</u>	
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28 02198.51855/5027712.2		
02198.31833/3027712.2	<u>-2-</u> Case No. 11-cv-01846-LHK (PSG) DECLARATION OF JOHN PIERCE IN SUPPORT OF SAMSUNG'S OPPOSITION TO APPLE'S MOTION TO COMPEL DEPOSITIONS OF SAMSUNG DECLARANTS	