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LTD., SAMSUNG ELECTRONICS AMERICA,  
16 INC. and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC  
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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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.  
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CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF VICTORIA F.  
MAROULIS IN SUPPORT OF  
SAMSUNG'S MOTION TO COMPEL  
DEPOSITIONS OF APPLE REPLY  
EXPERT DECLARANTS**

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DECLARATION OF VICTORIA F. MAROULIS

I, Victoria F. Maroulis, declare as follows:

1. I am a member of the bar of the State of California and a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”).

I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a series of emails between Robert Becher, counsel for Samsung, and Richard Hung, counsel for Apple, dated between November 12, 2012 and November 16, 2012. Mr. Becher asked if Apple would allow Samsung to depose Dr. Karan Singh, Dr. John Hauser and Marylee Robinson, limited to 3 hours each, and to submit a supplemental opposition not to exceed 5 pages addressing their supplemental testimony. Mr. Hung said that Apple would not agree. The parties were able to agree on a shortened briefing schedule for this motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Los Angeles, California on November 16, 2012.

*/s/ Victoria F. Maroulis*

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Victoria F. Maroulis