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9 Attorneys for Plaintiff and
10 Counterclaim-Defendant APPLE INC.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14
15 APPLE INC., a California corporation,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., A
Korean business entity; SAMSUNG
19 ELECTRONICS AMERICA, INC., a New York
corporation; SAMSUNG
20 TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company.,

21 Defendants.
22

Case No. 11-cv-01846-LHK

**DECLARATION OF DEOK KEUN
MATTHEW AHN IN SUPPORT OF
APPLE'S OPENING CLAIM
CONSTRUCTION BRIEF
PURSUANT TO PATENT L.R. 4-5**

Claim Construction
Hearing: Jan 20, 2012
Time: 10:00 a.m.
Place: Courtroom 4, 5th Floor
Judge: Honorable Lucy H. Koh

1 I, Deok Keun Matthew Ahn, declare as follows:

2 1. I am an associate at the law firm of Morrison & Foerster LLP, attorneys of record
3 in this action for plaintiff Apple Inc. ("Apple"). I submit this declaration in support of Apple's
4 Opening Claim Construction Brief Pursuant to Patent L.R. 4-5. Unless otherwise indicated, I
5 have personal knowledge of the matters set forth below. If called as a witness I could and would
6 testify competently as follows:

7 2. Attached hereto as Exhibit A to this Declaration is a true and correct copy of U.S.
8 Patent No. 6,493,002.

9 3. Attached hereto as Exhibit B to this Declaration is a true and correct copy of U.S.
10 Patent No. 7,469,381.

11 4. Attached hereto as Exhibit C to this Declaration is a true and correct copy of U.S.
12 Patent No. 7,663,607.

13 5. Attached hereto as Exhibit D to this Declaration is a true and correct copy of U.S.
14 Patent No. 7,812,828.

15 6. Attached hereto as Exhibit E to this Declaration is a true and correct copy of U.S.
16 Patent No. 7,844,915.

17 7. Attached hereto as Exhibit F to this Declaration is a true and correct copy of U.S.
18 Patent No. 7,853,891.

19 8. Attached hereto as Exhibit G to this Declaration is a true and correct copy of an
20 Amendment and Response to Office Action bearing Bates Numbers APLNDC00028053-28060,
21 excerpted from the produced file history of U.S. Patent No. 6,493,002.

22 9. Attached hereto as Exhibit H to this Declaration is a true and correct copy of a
23 Response to Final Office Action bearing Bates Numbers APLNDC00028082-28085, excerpted
24 from the produced file history of U.S. Patent No. 6,493,002.

25 10. Attached hereto as Exhibit I to this Declaration is a true and correct copy of an
26 excerpt from the transcript of the September 14, 2011 deposition of Andries van Dam.

27 11. Attached hereto as Exhibit J to this Declaration is a true and correct copy of an
28 excerpt from the transcript of the August 16, 2011 deposition of Ravin Balakrishnan.

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, 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 Deok Keun Matthew Ahn has concurred in this filing.

Dated: December 8, 2011

/s/ Michael A. Jacobs
Michael A. Jacobs