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

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.
27

CASE NO. 12-CV-00630-LHK (PSG)

**DECLARATION OF TODD BRIGGS
IN SUPPORT OF SAMSUNG'S REPLY
TO ITS MOTION FOR LEAVE TO
AMEND AND SUPPLEMENT ITS
INFRINGEMENT CONTENTIONS**

DECLARATION OF TODD BRIGGS

I, Todd Briggs, declare as follows:

1. I am a member of the bar of the State of California, admitted to practice before this Court, and a partner with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung") in this action. I make this declaration of personal knowledge, and if called and sworn as a witness, I could and would testify as set forth below.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Samsung's original Infringement Contentions.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Samsung's First Amended Infringement Contentions.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Samsung's Second Amended Infringement Contentions.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Apple's Response to Samsung's Fifth Set of Interrogatories.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from a document produced by Intel, beginning with bates number 160DOC000308.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from a document produced by Alcatel-Lucent, beginning with bates number ATT00001.

8. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from Apple's Supplemental Response to Samsung's Fourth Set of Interrogatories.

9. Attached hereto as **Exhibit 8** a true and correct copy of excerpts from an Apple document, bearing bates numbers APL630DEF-WH0001708694-0001708741.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 21, 2013, at Redwood Shores, California.

By /s/ Todd Briggs

Todd Briggs

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ATTESTATION

I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to Civil L.R. 5-1 that concurrence in the electronic filing of this document has been obtained from Todd Briggs.

/s/ Victoria F. Maroulis

Victoria F. Maroulis