

JOSH A. KREVITT (CA SBN 208552)
jkrevitt@gibsondunn.com
H. MARK LYON (CA SBN 162061)
mlyon@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1881 Page Mill Road
Palo Alto, CA 94304-1211
Telephone: (650) 849-5300
Facsimile: (650) 849-5333

MICHAEL A. JACOBS (CA SBN 111664)
mjacobs@mofocom
RICHARD S.J. HUNG (CA SBN 197425)
rhung@mofocom
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105-2482
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

Attorneys for Plaintiff and Counterclaim-Defendant Apple Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendants.

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

**NOTICE OF CORRECTIONS TO THE
DECLARATION OF EMILY FEDMAN IN
SUPPORT OF APPLE INC.'S MOTION FOR
LEAVE TO AMEND ITS DISCLOSURE OF
ASSERTED CLAIMS & INFRINGEMENT
CONTENTIONS**

HEARING:

Date: November 6, 2012
Time: 10:00 a.m.
Place: Courtroom 5
Judge: Honorable Paul S. Grewal

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Counterclaim-Plaintiffs,

v.

APPLE INC., a California corporation,

Counterclaim-Defendant.

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on October 5, 2012, Plaintiff Apple, Inc. (“Apple”) filed
3 its Motion for Leave to Amend its Disclosure of Asserted Claims & Infringement Contentions
4 (“Motion”). The hearing on this Motion shall take place on November 6, 2012, at 10:00 a.m., or as
5 soon thereafter as the matter may be heard, in Courtroom 5 of the above-entitled court, located at
6 United States District Court for the Northern District of California, Robert F. Peckham Federal
7 Building, 280 South 1st Street, San Jose, CA 95113.

8 Concurrently with the Motion, Apple filed the Declaration of Emily Fedman in Support of the
9 Motion. Apple has since discovered two errors. First, attached to the Declaration of Emily Fedman
10 was Exhibit 9, a table summarizing which Samsung devices Apple accused of infringing particular
11 claims of Apple’s patents. Attached hereto is a corrected Exhibit 9 to the Declaration of Emily
12 Fedman which contains corrections for United States Patent No. 8,046,721 (the “’721 patent”) and
13 United States Patent No. 5,946,647 (the “’647 patent”). Specifically, and consistent with the claim
14 charts served on October 5, 2012, Apple is correcting Exhibit 9 to reflect that Apple has accused the
15 Illusion and the Stratosphere of infringing claim 2 of the ’721 patent and that Apple has amended the
16 ’647 patent claim chart for the Galaxy Tab 7.0 Plus (Wi-Fi) to remove claim 8.

17 Second, attached as Exhibit 122 to the Declaration of Emily Fedman was an amended claim
18 chart for the Galaxy Nexus’ infringement of United States Patent No. 7,761,414 (the “’414 patent”).
19 Apple’s counsel removed an improper footnote that had been attached to the link to the website
20 listing the Specifications for the Galaxy Nexus. However, counsel failed to update the link itself.
21 The link on page 7 of the chart served on October 5, 2012, read, <http://www.samsung.com/uk/support>
22 [/model/GT-I9300MBDBTU-techspecs](http://www.samsung.com/uk/support/model/GT-I9300MBDBTU-techspecs), but should instead read, [http://www.samsung.com/us/](http://www.samsung.com/us/mobile/cell-phones/SCH-I515MSAVZW-specs)
23 [mobile/cell-phones/SCH-I515MSAVZW-specs](http://www.samsung.com/us/mobile/cell-phones/SCH-I515MSAVZW-specs), as should every other reference to Specifications of
24 the Galaxy Nexus throughout the ’414 infringement chart.

25 Dated: October 9, 2012

GIBSON, DUNN & CRUTCHER LLP

26 By: /s/ H. Mark Lyon
27 H. Mark Lyon
28 *Attorney for Apple Inc.*

CERTIFICATE OF SERVICE

1
2 The undersigned hereby certifies that the foregoing document was filed electronically in
3 compliance with Civil 5 Local Rule 5.4, and will be served on all counsel for Samsung Electronics
4 Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC who
5 have consented to electronic service in accordance with Civil Local Rule 5.4 via the Court's ECF
6 system.
7

8
9 Dated: October 9, 2012

/s/ H. Mark Lyon
H. Mark Lyon