

# **EXHIBIT 3**

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Attorneys for Plaintiff  
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. 11-cv-01846-LHK

**APPLE INC.'S FIRST AMENDED AND  
SUPPLEMENTAL INITIAL  
DISCLOSURES PURSUANT TO  
RULE 26(A)(1)**

Pursuant to Federal Rules of Civil Procedure 26(a)(1), (e)(1) Plaintiff Apple Inc. ("Apple") hereby amends and supplements its initial disclosures to Defendants Samsung Electronics Co., Ltd, Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung").

Apple provides these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of California and all relevant jurisdictions. By these disclosures, Apple does not concede the relevance or admissibility of any particular information. Apple makes these disclosures based on information currently available to it. Apple reserves the right to amend or supplement these disclosures and to present additional evidence to support its claims and defenses with any filing or during any proceeding in this action, including trial.

**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION [Fed R. Civ. P. 26(a)(1)(A)(i)]**

Apple identifies the following individuals who may have discoverable information that Apple may use to support its claims, defenses, or counterclaims in this action (unless solely for impeachment). Samsung should contact any current or former Apple employee, agent, or other representative only through Apple's counsel of record.

Name	Contact	Potential area(s) of knowledge (at least)
Inventors of the Apple design patents-in-suit, including:	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	The Apple patents-in-suit, including, conception, reduction to practice, and inventorship; Apple products embodying the inventions claimed by the pertinent Apple patents-in-suit; other Apple products; functionality of the asserted trade dress; selection of the asserted trade dress
Imran Chaudhri (7,853,891; 7,864,163; D627,790; D617,334; D604,305)		
Bartley Andre (D504,889; D622,270; D618,677; D593,087)		
Freddy Anzures (D604,305)		

Name	Contact	Potential area(s) of knowledge (at least)
Daniel Coster (D504,889; D622,270; D618,677; D593,087)		
Daniele De Iuliis (D504,889; D622,270; D618,677; D593,087)		
Richard Howarth (D504,889; D622,270; D618,677; D593,087)		
Jonathan Ive (D504,889; D622,270; D618,677; D593,087)		
Duncan Kerr (D504,889; D622,270; D618,677; D593,087)		
Shin Nishibori (D504,889; D622,270; D618,677; D593,087)		
Matthew Rohrbach (D504,889; D622,270; D618,677; D593,087)		
Peter Russell-Clark (D622,270)		
Douglas Satzger (D504,889; D622,270; D618,677; D593,087)		
Calvin Seid (D504,889; D622,270; D618,677; D593,087)		
Christopher Stringer (D504,889; D622,270; D618,677; D593,087)		
Eugene Whang (D504,889; D622,270; D618,677; D593,087)		
Rico Zörkendörfer (D504,889; D622,270;		

Name	Contact	Potential area(s) of knowledge (at least)
D618,677; D593,087)		
Inventors of the Apple utility patents-in-suit, including:	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	The pertinent Apple patents-in-suit, including, conception, reduction to practice, and inventorship; Apple products embodying the inventions claimed by the pertinent Apple patents-in-suit; other Apple products
Chris Blumenberg (7,864,163)		
Steven W. Christensen (6,493,002)		
Greg Christie (7,864,163)		
John Elias (7,812,828)		
Scott Forstall (7,864,163)		
Steve Hotelling (7,663,607; 7,920,129)		
Scott Herz (7,844,915)		
Brian Huppi (7,663,607)		
Brian Land (7,920,129)		
Stephen Lemay (7,864,163)		
Bas Ording (7,469,381; 7,853,891; 7,864,163)		
Andrew Platzer (7,844,915)		
Joshua Strickon (7,663,607)		
Marcel Van Os (7,864,163)		
Wayne Westerman (7,812,828)		
Richard Williamson (7,864,163)		

<b>Name</b>	<b>Contact</b>	<b>Potential area(s) of knowledge (at least)</b>
Sissie Twiggs	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Advertising of Apple products
Tamara Whiteside	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Advertising of Apple products
Suzanne Lindbergh	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Appearance of Apple products in popular media
Art Rangel	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Damages and irreparable harm to Apple
John Brown	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	The mobile phone, tablet and media player markets
Phil Schiller	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Apple's iPhone and iPad business
Bruce Sewell	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	License negotiations between Apple and Samsung
Greg Joswiak	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	iPod, iPhone & iOS product marketing; history and business of Apple
Eric Jue	Apple Inc.	iPhone marketing

<b>Name</b>	<b>Contact</b>	<b>Potential area(s) of knowledge (at least)</b>
	1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	
Stan Ng	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	iPod, iPhone & iOS product marketing
Michael Tchao	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	iPad product marketing
Mark Buckley	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Damages and irreparable harm to Apple
Richard Lutton	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Prosecution and licensing of Apple's patents-in-suit; license negotiations between Apple and Samsung
Boris Teksler	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	License negotiations between Apple and Samsung; Apple's licensing practices
Jason Shi	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	UMTS implementation in Apple products
Morgan Grainger	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
George Dicker	Apple Inc. 1 Infinite Loop Cupertino, CA 95014	Design and operation of accused functionality in accused Apple products

Name	Contact	Potential area(s) of knowledge (at least)
	[contact through counsel]	
Justin Santamaria	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
Thomas Alsina	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
Curt Rothert	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
Emilie Kim	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
Gregory Chapman	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
William Stewart	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Design and operation of accused functionality in accused Apple products
Tony Blevins	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Supply chain for baseband chips incorporated into accused Apple products; identity of baseband chips incorporated into accused Apple products
BJ Watrous	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Apple licensing and licenses



Name	Contact	Potential area(s) of knowledge (at least)
David Singer	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Apple's participation in 3GPP and ETSI
Saku Hieta	Apple Inc. 1 Infinite Loop Cupertino, CA 95014 [contact through counsel]	Supply chain for baseband chips incorporated into accused Apple products; identity of baseband chips incorporated into accused Apple products
Michael Mallie	Blakely, Sokoloff, Taylor & Zafman LLP 1279 Oakmead Parkway Sunnyvale, CA 94085	Prosecution of Apple's utility patents-in-suit, including at least U.S. Patent No. 6,493,002
Robert Beyers	Morgan, Lewis & Bockius LLP 2 Palo Alto Square 3000 El Camino Real, Suite 700 Palo Alto, CA 94306	Prosecution of Apple's utility patents-in-suit, including at least U.S. Patent Nos. 7,469,381 & U.S. 7,684,163
Glenn Kubota	Morrison & Foerster LLP 555 West Fifth Street Suite 3500 Los Angeles, CA 90013	Prosecution of Apple's utility patents-in-suit, including at least U.S. Patent Nos. 7,663,607, 7,812,828 & 7,920,129
James Scheller	Blakely, Sokoloff, Taylor & Zafman LLP 1279 Oakmead Parkway Sunnyvale, CA 94085	Prosecution of Apple's utility patents-in-suit, including at least U.S. Patent Nos. 7,844,915 & 7,853,891
Tracy-Gene Durkin	Sterne, Kessler, Goldstein, & Fox PLLC 1100 New York Avenue Washington, DC 20005	Prosecution of Apple's design patents-in-suit
Inventors of the Samsung Patents-in-Suit, including:	Unknown	Upon information and belief, the Samsung Patents-in-Suit, including, conception, reduction to practice, and inventorship
Joon-Young Cho (7,447,516)		
Gin-Kyu Choi (7,200,792)		

Name	Contact	Potential area(s) of knowledge (at least)
Soon-Jae Choi (7,050,410; 7,386,001)		
Sung-ho Eun (7,577,460)		
Youn-Hyoung Heo (7,447,516)		
Joong-Ho Jeong (6,928,604)		
Moon-Sang Jeong (7,698,711)		
Beong-Jo Kim (7,050,410; 7,386,001)		
Hee-Won Kang (7,362,867)		
Hun-Kee Kim (7,200,792)		
Jae-Yoel Kim (7,362,867)		
Min-Goo Kim (7,050,410; 7,386,001)		
Noh-Sun Kim (7,200,792)		
Pyung-soo Kim (7,079,871)		
Se-Hyoung Kim (7,050,410; 7,386,001)		
Soeng-Hun Kim (7,675,941)		
Yong-Jun Kwak (7,447,516)		
Young-Bum Kim (7,447,516)		
Hye-Young Lee (7,069,055)		
Hyeon-Woo Lee (7,069,055)		
Ju-Ho Lee (7,447,516)		
Jun-Sung Lee (7,200,792)		
Young-Hwan Lee (7,386,001)		

Name	Contact	Potential area(s) of knowledge (at least)
Yong-Suk Moon (7,200,792)		
Chang-Soo Park (6,928,604)		
Hyuk-soo Son (7,456,893)		
Himke Van Der Velde (7,675,941)		
Gert-Jan Van Lieshout (7,675,941)		
Jae-Seung Yoon (7,200,792)		
Rocco S. Barrese	Upon information and belief: Dilworth & Barrese, LLP 1000 Woodbury Road Suite 405 Woodbury, NY 11797	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,577,460
Michael A. Bush	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,079,871
Simon G. Booth	Upon information and belief: Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,675,941
Frank Chau	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,069,055
Peter G. Dilworth	Upon information and belief: Dilworth & Barrese, LLP 1000 Woodbury Road Suite 405 Woodbury, NY 11797	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent Nos. 7,069,055 and 7,577,460

Name	Contact	Potential area(s) of knowledge (at least)
George C. Eckert	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. 7,698,711
Paul J. Farrell	Upon information and belief: The Farrell Law Firm, P.C. 290 Broadhollow Road, Suite 210E Melville, New York 11747	Upon information and belief, the prosecution of Samsung Patents-in-Suit, including at least U.S. Patent Nos. 7,050,410, 6,928,604, 7,200,792, 7,362,867, 7,386,001, 7,069,055, & 7,577,460
John E. Holmes	Upon information and belief: Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent Nos. 7,675,941, 7,698,711, and 7,447,516
Blandon S. Bludau	Upon information and belief: Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. 7,698,711
Dana D. Ivey	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,675,941
Peter L. Kendall	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,447,516
Stacy J. Longanecker	Upon information and belief: Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,675,941

Name	Contact	Potential area(s) of knowledge (at least)
Jundong Ma	Upon information and belief:  Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,447,516
Christian C. Michel	Upon information and belief:  Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,675,941
David R. Morris	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,456,893
Michael J. Musella	Upon information and belief:  Dilworth & Barrese, LLP 1000 Woodbury Road Suite 405 Woodbury, NY 11797	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent Nos. 7,200,792, 6,928,604, 7,362,867, 7,386,001, and 7,577,460
Raymond B. Persino	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,447,516
Brian C. Rupp	Upon information and belief:  Drinker Biddle & Reath LLP 191 N. Wacker Dr., Ste. 3700 Chicago, IL 60606-1698	The prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,456,893

<b>Name</b>	<b>Contact</b>	<b>Potential area(s) of knowledge (at least)</b>
Maeng-Ho Shin	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,447,516
Michael D. Stein	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,079,871
Daniel E. Tierney	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,200,792, 6,928,604, and 7,069,055
Stanislav Torgovitsky	Upon information and belief:  Roylance, Abrams, Berdo & Goodman LLP 1300 19th Street, NW Suite 600 Washington D.C. 20036	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,675,941
Richard A. Wulff	Unknown	Upon information and belief, the prosecution of the Samsung Patents-in-Suit, including at least U.S. Patent No. 7,456,893
Seung Ho Ahn	Believed to be a current Samsung employee	License negotiations between Apple and Samsung
JY Lee	Believed to be a current Samsung employee	License negotiations between Apple and Samsung
Kwang Jun Kim	Believed to be a current Samsung employee	License negotiations between Apple and Samsung
Employees of Infineon Technologies AG, Intel Mobile Communications GmbH and/or Intel Corporation	Infineon Technologies AG Am Campeon 1-12 85579 Neubiberg Germany  Intel Mobile Communications GmbH Dornacher Strasse 1 Neubiberg, Munich, Germany	UMTS implementation in chips supplied to Apple; any licensing of the Samsung Patents-in-Suit

Name	Contact	Potential area(s) of knowledge (at least)
	Intel Corporation 2200 Mission College Blvd. Santa Clara, CA 95054	

In addition to the individuals identified above, the following individuals may have discoverable information: (i) persons deposed during this litigation and persons identified during such depositions; (ii) persons identified in Samsung's Initial Disclosures; and (iii) other individuals at Samsung.

Apple will identify any testifying expert witnesses as required by Rule 26(a)(2) and any applicable Local Rule or order of the Court.

## **II. DESCRIPTION OF DOCUMENTS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]**

Apple identifies the following documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its claims and defenses (unless solely for impeachment). Concurrently with service of these Initial Disclosures, Apple is producing to Samsung documents in its possession relating to one or more of these categories.

- File histories and prior art references cited by the U.S. Patent and Trademark Office during prosecution of the Apple patents asserted in the Amended Complaint
- Documents, prototypes, and source code reflecting the conception and reduction to practice of the inventions claimed in the Apple patents asserted in the Amended Complaint
- Documents reflecting Samsung's willful infringement of the Apple patents asserted in the Amended Complaint
- Documents reflecting the damages and irreparable harm resulting from Samsung's willful infringement of the Apple patents asserted in the Amended Complaint

- 1 • File histories for the trade dress and trademark registrations asserted in the
- 2 Amended Complaint
- 3 • Documents reflecting the selection of the trademarks asserted in the Amended
- 4 Complaint
- 5 • Prior art to the Samsung Patents-in-Suit
- 6 • File histories of the Samsung Patents-in-Suit
- 7 • Documents depicting the design, structure, and operation of accused functionality
- 8 or components of the Apple products accused of infringing the Samsung Patents-
- 9 in-Suit ("accused Apple products")
- 10 • Documents sufficient to show various financial information for the accused Apple
- 11 products
- 12 • Documents reflecting license negotiations between Apple and Samsung

13 Apple reserves the right to object to the production of documents on any basis, including  
 14 that the information sought: (i) is not relevant; (ii) is protected from disclosure by an applicable  
 15 privilege, doctrine, or immunity; (iii) would be unduly burdensome or expensive to produce; (iv)  
 16 contains third party confidential information and cannot be produced without that party's  
 17 notification and consent; or (v) constitutes proprietary or trade secret information that should not  
 18 be produced before an appropriate protective order has been entered.

19 Apple's investigation for discoverable information that it may use to support its claims or  
 20 defenses in this litigation is ongoing. Apple also may rely on documents that are produced by  
 21 any party to this litigation, including Apple itself and Samsung.

### 22 **III. COMPUTATION OF DAMAGES [Fed. R. Civ. P. 26(a)(1)(A)(iii)]**

23 Pursuant to Rule 26(a)(1)(A)(iii), Apple intends to seek an accounting for damages,  
 24 enhanced or treble damages for Samsung's deliberate and willful infringement, and pre- and  
 25 post-judgment interest, in addition to a preliminary and permanent injunction. However, the  
 26 amount of damages arising from Samsung's willful infringement is not ascertainable at this time,  
 27 some or all of the injuries are ongoing, and the computation of damages may require discovery



and expert testimony. Apple also claims damages as a result of Samsung's anticompetitive conduct and unlawful business acts and practices, including its failure to offer Apple a license on fair, reasonable and non-discriminatory (FRAND) terms to Samsung's claimed standards-essential patents. In addition, pursuant to Section 4 of the Clayton Act and/or Section 16750 of the California Business and Professions Code, Apple is entitled to treble the amount of its actual damages suffered as a result of Samsung's conduct and all reasonable attorneys' fees and costs.

Apple does not believe that Samsung has suffered any damages as a result of any conduct by Apple. Apple intends to seek its attorneys fees and costs and other relief as is deemed appropriate. These fees and costs and amount of any other relief that may be deemed appropriate are not susceptible to calculation at this time.

#### **IV. INSURANCE AGREEMENTS [Fed. R. Civ. P. 26(a)(1)(A)(iv)]**

Apple is currently unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse Apple for payments made to satisfy such a judgment.

Dated: March 4, 2012

MORRISON & FOERSTER LLP

By: /s/ Michael A. Jacobs  
Michael A. Jacobs

Attorneys for Plaintiff  
APPLE INC.

Dated: March 4, 2012

WILMER CUTLER PICKERING  
HALE AND DORR LLP

By: /s/ Mark D. Selwyn  
Mark D. Selwyn

Attorneys for Plaintiff  
APPLE INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 4, 2012 by e-mail upon the following:

Charles Kramer Verhoeven (Cal. Bar No. 170151)  
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Victoria F. Maroulis (Cal. Bar No. 202603)  
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Michael T. Zeller (Cal. Bar No. 196417)  
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Los Angeles, California 90017  
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/s/ Mia Mazza  
Mia Mazza