

EXHIBIT 8

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15 INC. and SAMSUNG
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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
19

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

27 Defendant.
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CASE NO. 12-cv-00630-LHK

**SAMSUNG'S FIRST SUPPLEMENTAL
OBJECTIONS AND RESPONSES TO
APPLE'S FIRST SET OF PRELIMINARY
INJUNCTION INTERROGATORIES (No.
10)**

1 Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendants Samsung
2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC, (“Samsung”) submit the following Supplemental Objections and Responses to
4 Plaintiff Apple Inc’s (“Apple’s”) First Set of Preliminary Injunction Interrogatories to Defendants.

5 **GENERAL OBJECTIONS**

6 Samsung hereby incorporates by reference the General Objections to Interrogatories in
7 Samsung's Objections and Responses to Apple's First Set of Preliminary Injunction Interrogatories
8 (Nos. 1-10) as if fully set forth herein.

9 **SPECIFIC OBJECTIONS AND RESPONSES**

10 **INTERROGATORY NO. 10:**

11 For each of the following, identify all discussions, internally or with third parties,
12 regarding, or consideration of, the design, and implementation of, any of the accused features,
13 including (i) Slide to Unlock, (ii) Text Correction, (iii) Unified Search, and (iv) Special Text
14 Detection as implemented in any Samsung product, including but not limited to Samsung
15 smartphones and tablet computers, and identify the three persons most knowledgeable about such
16 discussions, designs, and implementation.

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18 **OBJECTIONS AND RESPONSE TO INTERROGATORY NO. 10:**

19 In addition to its General Objections above, which it hereby incorporates by reference,
20 Samsung objects to this Interrogatory on the ground that: (i) it seeks to elicit information subject
21 to and protected by the attorney-client privilege, the attorney work-product doctrine, the joint
22 defense privilege, the common interest doctrine, and/or any other applicable privilege or
23 immunity; (ii) it is overly broad and unduly burdensome in that it seeks information not relevant to
24 Apple’s Motion for a Preliminary Injunction; (iii) it is overly broad, unduly burdensome, and
25 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence to the
26 extent that it seeks “all discussions . . . or consideration of” “any of the accused features”; (iv) it
27 seeks confidential proprietary or trade secret information of a third party (Google); (v) it is vague
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1 and ambiguous, especially with regard to the term “consideration of”; (vi) it is vague, ambiguous,
2 and unintelligible to the extent it seeks information about any “accused features” that are not
3 specifically identified in the interrogatory; and (vii) it is compound and comprises discrete
4 subparts resulting in separate interrogatories.

5 Subject to and without waiving the foregoing general and specific objections, Samsung
6 responds as follows:

7 Samsung is presently unaware of any non-privileged discussions, internally or externally,
8 regarding design or implementation of the four accused features – Slide to Unlock, Text
9 Correction, Unified Search and Special Text Detection – of Galaxy Nexus. Samsung's
10 investigation is ongoing and, to the extent that Samsung's investigation subsequently reveals the
11 existence of any such discussions, then Samsung will supplement this response accordingly as
12 well as produce responsive non-privileged documents regarding such discussions.

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14 **FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10:**

15 Subject to and incorporating its General Objections and Specific Objections from
16 Samsung's Objections and Responses to Apple's First Set of Preliminary Injunction Interrogatories
17 with regard to Interrogatory No. 10, Samsung provides the following supplemental response:

18 The Android 4.0 Ice Cream Sandwich operating system was created by Google. Thus, the
19 four accused features of Galaxy Nexus – Slide to Unlock, Text Correction, Unified Search and
20 Special Text Detection – were designed and implemented by Google, not Samsung. During
21 development of the Galaxy Nexus, Samsung had the opportunity to perform quality assurance
22 testing on various features of Ice Cream Sandwich and report bugs to Google. Samsung's quality
23 assurance testing included testing that implicated one or more of the four accused features. In
24 connection with this quality assurance testing, Samsung identified and reported a small number of
25 bugs related to the accused features to Google through Google's electronic bug filing system.
26 Samsung shall produce documents relating to these filed bugs to the extent they relate to the four
27 accused features and to the extent they are located pursuant to a reasonable search.

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Respectfully submitted,

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