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10 Attorneys for Samsung Electronics Co., Ltd.,  
11 Samsung Electronics America, Inc., and  
Samsung Research America, Inc.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 HUAWEI TECHNOLOGIES CO., LTD., et al.,

16 Plaintiffs,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., et al.,

19 Defendants.

20  
21 SAMSUNG ELECTRONICS CO., LTD. &  
SAMSUNG ELECTRONICS AMERICA, INC.

22 Counterclaim-Plaintiffs,

23 v.

24 HUAWEI TECHNOLOGIES CO., LTD.,  
25 HUAWEI DEVICE USA, INC., HUAWEI  
TECHNOLOGIES USA, INC., & HISILICON  
26 TECHNOLOGIES CO., LTD.

27 Counterclaim-Defendants.  
28

CASE NO. 16-cv-02787-WHO

**SAMSUNG'S MOTION TO  
PARTIALLY EXCLUDE THE  
REPORT AND TESTIMONY OF  
JORGE PADILLA, MICHAEL J.  
LASINSKI, AND CHARLES L.  
JACKSON AND STRIKE THE  
REBUTTAL OPINIONS OF  
JACQUES DELISLE AND ZHI DING**

**Hearing Date: August 8, 2018  
Time: 2:00 p.m.  
Place: Courtroom 2, 17th Floor  
Judge: Hon. William H. Orrick**

**PUBLIC REDACTED VERSION**

1 TO PLAINTIFFS AND COUNTERCLAIM-DEFENDANTS HUAWEI TECHNOLOGIES CO.,  
2 LTD., HUAWEI DEVICE USA, INC., HUAWEI TECHNOLOGIES USA, INC., AND  
3 HISILICON TECHNOLOGIES CO., LTD., AND THEIR COUNSEL OF RECORD

4 PLEASE TAKE NOTICE that on August 8, 2018 at 2:00 p.m., or as soon thereafter as the  
5 matter may be heard, in the courtroom of the Honorable William H. Orrick, located at 450 Golden  
6 Gate Avenue, San Francisco, California 94102, Defendants and Counterclaim-Plaintiffs Samsung  
7 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Research America, Inc.  
8 (collectively “Samsung”) respectfully request under Rule 702 of the Federal Rules of Evidence that  
9 this Court partially exclude the reports and testimony of Jorge Padilla, Michael J. Lasinski, and  
10 Charles L. Jackson proffered by Huawei Technologies Co., Ltd., Huawei Device USA, Inc., Huawei  
11 Technologies USA, Inc., and HiSilicon Technologies Co., Ltd. (collectively “Huawei”). Samsung  
12 also respectfully requests under Rule 26(a)(2)(D)(ii) of the Federal Rules of Civil Procedure that  
13 this Court strike certain rebuttal opinions offered by Jacques deLisle and Zhi Ding.

14 This motion is based on this notice of motion and supporting memorandum of points and  
15 authorities, the supporting declaration of Sam Stake, the accompanying exhibits, reply briefing in  
16 further support of this motion and supporting declarations and accompanying exhibits, as well as  
17 other written or oral argument that Samsung may present to the Court.

18  
19 DATED: July 3, 2018

Respectfully submitted,

20 QUINN EMANUEL URQUHART &  
21 SULLIVAN, LLP

22 By /s/ Victoria F. Maroulis

23 Charles K. Verhoeven  
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Samsung Research America, Inc.*

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