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8  
9 Attorneys for Plaintiff and  
10 Counterclaim-Defendant APPLE INC.

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION

14  
15 APPLE INC., a California corporation,  
16 Plaintiff,

17 v.

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

21 Defendants.  
22

Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF RACHEL KREVANS  
IN SUPPORT OF APPLE'S BILL OF COSTS**

1 I, RACHEL KREVANS, hereby declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP, which is counsel of  
3 record for Plaintiff and Counterclaim-Defendant Apple Inc. (“Apple”) in this case. I am  
4 admitted to practice law in the State of California and before this Court. I make this declaration  
5 in support of Apple’s Bill of Costs. I have knowledge of the matters stated in this declaration,  
6 and I could and would testify competently thereto if called to do so.

7 2. Two law firms represented Apple in this matter, preparing the case together and  
8 taking it to trial. Morrison & Foerster LLP took primary responsibility for Apple’s claims  
9 against Samsung, and Wilmer Cutler Pickering Hale and Dorr LLP took primary responsibility  
10 for defending Apple against Samsung’s claims. This declaration only addresses the costs  
11 collected together by Morrison & Foerster (“Morrison Costs”), as reflected in Schedules A-1,  
12 A-2, B-1, B-2, B-3, B-4, B-5, B-6, and C, and the corresponding exhibits. The costs collected by  
13 Wilmer Cutler Pickering Hale and Dorr are supported by the Declaration of Mark D. Selwyn in  
14 Support of Apple’s Bill of Costs.

15 3. On August 24, 2012, the Court entered Judgment in this matter. (ECF No. 1933.)  
16 As reflected in the Judgment and the jury verdict (ECF No. 1931), Apple prevailed on a  
17 substantial part of the litigation. Defendants did not prevail on their counterclaims. On  
18 November 21, 2013, following a retrial of a portion of the previous damages award, a jury again  
19 returned a verdict in favor of Apple (ECF No. 2822), and the Court entered judgment based on  
20 that verdict (ECF No. 2823). Accordingly, Apple is the prevailing party and is entitled to  
21 recover costs pursuant to Fed. R. Civ. P. 54(d), 17 U.S.C. § 505, and Civil Local Rule 54.

22 4. I have reviewed Apple’s Bill of Costs and the schedules and invoices for the  
23 Morrison Costs submitted therewith (Schedules A-1, A-2, B-1, B-2, B-3, B-4, B-5, B-6, and C,  
24 and the corresponding exhibits). The Morrison Costs included in Apple’s Bill of Costs are  
25 correctly stated and were necessarily incurred in this action, and the services for which fees have  
26 been charged were actually and necessarily performed. Further, the Morrison Costs in Apple’s  
27 Bill of Costs are fairly attributable to the claims asserted in this litigation and are recoverable by  
28 Apple under 28 U.S.C. § 1920, Civil Local Rule 54-3, and relevant case law.

1           **A.     Printed or Electronically Recorded Transcripts**

2           5.       “Fees for printed or electronically recorded transcripts necessarily obtained for use  
3 in the case” are taxable pursuant to 28 U.S.C. § 1920(2).

4           6.       Apple seeks costs of deposition, trial, and hearing transcripts in the amount of  
5 \$621,037.59 (Morrison Costs), divided between deposition transcripts (Schedule A-1) and  
6 hearing and trial transcripts (Schedule A-2).

7                   **1.     Deposition Transcripts (Schedule A-1)**

8           7.       Apple seeks costs of deposition transcripts in the amount of \$550,387.96  
9 (Morrison Costs). (*See* Schedule A-1.)

10          8.       Under 28 U.S.C. § 1920(2) and Civil Local Rule 54-3, costs for deposition  
11 transcripts and videotapes are recoverable. Civil Local Rule 54-3(c)(1) allows “[t]he cost of an  
12 original and one copy of any deposition (including videotaped depositions) taken for any purpose  
13 in connection with the case.” The cost of reproducing exhibits for depositions is also  
14 recoverable. *See* Civil Local Rule 54-3(c)(3) (“The cost of reproducing exhibits to depositions is  
15 allowable if the cost of the deposition is allowable.”)

16          9.       Both parties acknowledged at the outset of the case that they would need to take a  
17 significant number of depositions. Apple requested 150 hours of total deposition time for each  
18 side in Apple’s affirmative case against Samsung and 325 hours of total deposition time for each  
19 side in Samsung’s affirmative case against Apple. (ECF No. 157 at 10.) Samsung’s proposal  
20 was similar, requesting 450 hours for each side for the entire case. (*Id.* at 11.) The Court  
21 granted each side 250 hours of deposition time. (ECF No. 187 at 1.) For Apple’s affirmative  
22 infringement case, Apple took the deposition of 98 Samsung witnesses and 10 third-party  
23 witnesses. In addition, Apple took the deposition of 16 Samsung experts, and Samsung took the  
24 deposition of 18 Apple experts.

25          10.       Pursuant to Civil Local Rule 54-3(c), Apple has included in its Bill of Costs for  
26 each deposition only the costs related to one electronic written transcript, including exhibits, and  
27 one expedited copy of the written transcript. Apple has also included the costs related to the  
28 videotape of the deposition. This Court regularly permits taxation of costs for both video and a

1 stenographic transcript. *See MEMC Elec. Materials v. Mitsubishi Materials*, No. C-01-4925  
2 SBA (JCS), 2004 U.S. Dist. LEXIS 29359, at \*10 (N.D. Cal. Oct. 22, 2004) (“The Court  
3 concludes . . . that a sensible reading of the rule covers the cost of videotaping *and* the cost  
4 incurred by the court reporter associated with obtaining a stenographic transcription of a  
5 deposition, as well as the cost of one copy of the videotape and of the written transcript”); *eBay*  
6 *Inc. v. Kelora Sys., LLC*, Nos. C 10-4947 CW (LB), C 11-1398 CW (LB), C 11-1548 CW (LB),  
7 2013 U.S. Dist. LEXIS 49835, at \*32-33 (N.D. Cal. Apr. 5, 2013) (granting costs for video  
8 depositions as “commonplace”); *Kalitta Air, LLC v. Cent. Tex. Airborne Sys.*, No. C 96-2494  
9 CW, 2012 U.S. Dist. LEXIS 172679, at\*15-16 (N.D. Cal. Dec. 5, 2012) (taxing costs for both  
10 stenographic transcript and videotape as appropriate expenses). The Federal Circuit, in applying  
11 this district’s local rules, has also found that taxing costs both for a stenographic transcript and a  
12 video deposition is a “commonplace practice.” *In re Ricoh Co. Patent Litig.*, 661 F.3d 1361,  
13 1370 (Fed. Cir. 2011). This Court also taxes shipping and handling costs. *See Petroliam*  
14 *Nasional Berhad v. GoDaddy.com, Inc.*, No. C 09-5939 PJH, 2012 U.S. Dist. LEXIS 64555, at  
15 \*6 (N.D. Cal. May 8, 2012) (“[T]he court finds that the charge for ‘shipping and handling’ can  
16 reasonably be viewed as part of ‘the cost of an original and one copy of any deposition.’”); *In re*  
17 *Ricoh Co.*, No. C 03-02289 JW, 2010 U.S. Dist. LEXIS 144033, at \*17 (N.D. Cal. Sept. 29,  
18 2010) (holding “shipping costs for deposition transcripts are taxable”).

19 11. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
20 taking depositions is attached as Schedule A-1 to the Bill of Costs. For example, for the  
21 deposition of Richard Lutton, Apple requests the costs of the written transcript (\$1,225.00), the  
22 exhibits (\$735.00), the expedited copy of the written transcript (\$1207.50), and shipping and  
23 handling (\$70.00) – totaling \$3,237.50. In addition, Apple requests the costs of the videotape  
24 (\$475.00) and associated shipping and handling (\$40) – totaling \$515.00.

25 12. True and correct copies of invoices supporting the Morrison Costs in Schedule A-1  
26 are attached as Exhibit A-1 to the Bill of Costs. Included in Exhibit A-1 are invoices from the  
27 following court reporting firms: American Realtime Court Reporters, Cook & Wiley  
28

1 Reporting, Inc., Merrill Corp. (dba LegalLink, Inc.), Transperfect Legal Solutions, TSG  
 2 Reporting, Inc., Veritext Corp., Video Works, and VideoWorks of Virginia, Inc.

3 **2. Hearing and Trial Transcripts (Schedule A-2)**

4 13. Pursuant to 28 U.S.C. § 1920(2) and Civil Local Rule 54-3, Apple seeks costs of  
 5 hearing and trial transcripts in the amount of \$70,649.63 (Morrison Costs). (*See* Schedule A-2.)  
 6 Case law supports such recovery. *See Affymetrix, Inc. v. Multilyte Ltd.*, No. C 03-03779 WHA,  
 7 2005 U.S. Dist. LEXIS 41177, \*5-6 (N.D. Cal. Aug. 26, 2005), *aff'd*, No. 05-1460, 2006 U.S.  
 8 App. LEXIS 8312 (Fed. Cir. Mar. 24, 2006) (finding that “[i]t was reasonable for [the prevailing  
 9 party] to incur the expense of transcripts for all court proceedings, given that [the] case was so  
 10 contentiously litigated” and awarding court reporter’s fees for “the cost of all hearing transcripts  
 11 because they were ‘necessarily obtained.’”).

12 14. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred for  
 13 hearing and trial transcripts is attached as Schedule A-2 to the Bill of Costs.

14 15. True and correct copies of invoices supporting the Morrison Costs in Schedule A-2  
 15 are attached as Exhibit A-2 to the Bill of Costs.

16 **B. Exemplification, Costs of Making Copies, and Related Items**

17 16. “Fees for exemplification and the costs of making copies of any materials where  
 18 the copies are necessarily obtained for use in the case” are taxable pursuant to  
 19 28 U.S.C. § 1920(4).

20 17. Apple seeks costs associated with its production of documents and other evidence  
 21 and its preparation of demonstrative evidence in the amount of \$4,503,761.46 (Morrison Costs),  
 22 as broken out into the six subcategories set forth in subsections B-1 to B-6.

23 **1. Costs of Making Copies (Schedule B-1)**

24 18. Apple seeks its costs of reproducing documents for purposes of disclosure and  
 25 other formal discovery processes (*e.g.*, exhibits for depositions) in the amount of \$1,498,038.41  
 26 (Morrison Costs). (*See* Schedule B-1.) Civil Local Rule 54-3(d)(2) allows for recovery of “[t]he  
 27 cost of reproducing disclosure or formal discovery documents when used for any purpose in the  
 28 case.” *See Weco Supply Co. v. Sherwin-Williams Co.*, No. 1:10-CV-00171 AWI BAM, 2013

1 U.S. Dist. LEXIS 1572, at \*14-15 (E.D. Cal. Jan. 3, 2013) (allowing recovery of “copying costs  
2 for copies made for the convenience, preparation, research, or records of counsel”).

3 19. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
4 reproducing documents is attached as Schedule B-1 to the Bill of Costs. The costs that Apple is  
5 seeking include only the amounts for making copies. Costs of vendor consultation and supplies,  
6 as well as the sales tax attributable to those costs, have been excluded.

7 20. True and correct copies of invoices supporting the Morrison Costs in Schedule B-1  
8 are attached as Exhibit B-1 to the Bill of Costs. Included in Exhibit B-1 are invoices from  
9 various copying vendors, including Elite Document Solutions, Warp 9, DSU Discovery,  
10 eLitigation Solutions, Document Technologies, Teris.com, Advanced Discovery, Digital Copy,  
11 On Press Graphics, Inc., Evolve Discovery, Ricoh, and Transperfect.

## 12 **2. Devices (Schedule B-2)**

13 21. Apple seeks the costs it incurred in purchasing devices for evidentiary and  
14 demonstrative purposes in the amount of \$123,379.74 (Morrison Costs). (*See* Schedule B-2.)

15 22. Apple accused approximately thirty Samsung smartphones and tablets of violating  
16 Apple’s asserted intellectual property rights, including the: Acclaim, Captivate, Continuum,  
17 Droid Charge, Exhibit 4G, Epic 4G, Fascinate, Gem, Galaxy Ace, Galaxy Prevail, Galaxy S  
18 (i9000), Galaxy S 4G, Gravity, Indulge, Infuse 4G, Intercept, Mesmerize, Nexus S, Nexus S 4G,  
19 Replenish, Showcase i500, Showcase Galaxy S, Sidekick, Transform, Vibrant, Galaxy Tab,  
20 Galaxy Tab 10.1, and Galaxy S II. (ECF No. 75 (“Amended Compl.”) ¶ 92.) The number of  
21 accused products is a result of the breadth of infringement and Samsung’s business strategy of  
22 providing a broad range of models for subsets of the consumer market and for different wireless  
23 providers.

24 23. The costs that Apple is seeking are only for devices used as trial or deposition  
25 exhibits, or used for purposes of expert analysis.

26 24. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
27 purchasing devices is attached as Schedule B-2 to the Bill of Costs. All of the devices reflected  
28

1 in the spreadsheet were used as trial or deposition exhibits, or used for purposes of expert  
2 analysis, as indicated in Column G of the spreadsheet.

3 25. True and correct copies of invoices supporting the Morrison Costs in Schedule B-2  
4 are attached as Exhibit B-2 to the Bill of Costs.

5 **3. Trial Graphics and Demonstratives (Schedule B-3)**

6 26. Apple seeks costs of preparing trial graphics and demonstratives in the amount of  
7 \$1,250,957.94 (Morrison Costs). (*See* Schedule B-3.) These costs are recoverable under 28  
8 U.S.C. § 1920(4) and Civil Local Rule 54-3(d)(5).

9 27. “Fees for exemplification” under 28 U.S.C. § 1920(4) have been interpreted to  
10 include demonstrative evidence. *See, e.g., Maxwell v. Hapag-Lloyd Aktiengesellschaft*, 862 F.2d  
11 767, 770 (9th Cir. 1998) (“In the context of § 1920, ‘exemplification and copies of papers’ has  
12 been interpreted to include all types of demonstrative evidence, including photographs and  
13 graphic aids”); *Computer Cache Coherency Corp. v. Intel Corp.*, No. C 05-01766 RMW,  
14 2009 U.S. Dist. LEXIS 122596, at \*5-6 (N.D. Cal. Dec. 18, 2009) (awarding costs associated  
15 with graphics presentations for tutorial and Markman hearings as the “presentations were useful  
16 and reasonably necessary given the complexity of the issues in this case”); *SEIU v. Rosselli*,  
17 No. C 09-00404 WHA, 2010 U.S. Dist. LEXIS 122202, at \*12 (N.D. Cal. Nov. 1, 2010)  
18 (rejecting plaintiffs’ argument that “the cost of trial exhibits should not be recoverable” and  
19 stating that “all types of demonstrative evidence” are included in recoverable costs).

20 28. The Civil Local Rules also provide that “[t]he cost of preparing charts, diagrams,  
21 videotapes and other visual aids to be used as exhibits is allowable if such exhibits are  
22 reasonably necessary to assist the jury or the Court in understanding the issues at the trial.” Civil  
23 Local Rule 54-3(d)(5).

24 29. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
25 preparing trial graphics and demonstratives is attached as Schedule B-3 to the Bill of Costs.  
26 Costs related to consultation and meetings, trial technical support, equipment rental, and  
27 miscellaneous expenses have been excluded. For example, the first entry in Schedule B-3 relates  
28 to an invoice from Fulcrum Legal Graphics, Inc. for the total amount of \$34,044.51. Of this

1 amount, charges relating to meetings and communications, equipment rental, and messenger  
2 delivery – totaling \$3,373.63 – were excluded. The specific items excluded are crossed out in  
3 the corresponding itemized invoices included in Exhibit B-3. Thus, in this example, of the  
4 invoiced total of \$34,044.51, Apple seeks only the \$30,670.88 incurred specifically for  
5 preparation of trial graphics.

6 30. True and correct copies of invoices supporting the Morrison Costs in Schedule B-3  
7 are attached as Exhibit B-3 to the Bill of Costs. Included in Exhibit B-3 are invoices from the  
8 following vendors that created the trial graphics and demonstratives: Fulcrum Legal  
9 Graphics, Inc., Impact Trial Consulting, and Warp 9, Inc.

10 **4. Electronic Discovery: File Processing/Uploads**  
11 **(Schedule B-4)**

12 31. Pursuant to 28 U.S.C. § 1920, Federal Rule of Civil Procedure 54, and Civil Local  
13 Rule 54-3, Apple seeks e-discovery costs associated with file processing and uploads in the  
14 amount of \$1,198,919.56 (Morrison Costs). (*See* Schedule B-4.)

15 32. Case law supports such recovery. *See, e.g., In re Ricoh Co., Ltd. Patent Litig.*,  
16 661 F.3d at 1365 (“[T]he costs of producing a document electronically can be recoverable under  
17 section 1920(4).”); *eBay Inc.*, 2013 U.S. Dist. LEXIS 49835, at \*25-26 (costs for “scanning  
18 paper documents, electronic scanning and conversion to PDF, TIFF conversion, OCR, image  
19 endorsement/Bates stamping, slip sheet preparation, blowback scanning paper documents, media  
20 hardware used for production, electronically stamping Bates numbers, slipsheet preparation,  
21 blowback preparation, and OCR conversion” are recoverable); *Parrish v. Manatt, Phelps &*  
22 *Phillips, LLP*, No. C 10-03200 WHA, 2011 U.S. Dist LEXIS 41021, at \*7 (N.D. Cal. Apr. 11,  
23 2011) (“The reproduction costs defendants incurred in collecting, reviewing, and preparing client  
24 documents for production were necessary expenditures made for the purpose of advancing the  
25 investigation and discovery phases of the action. As such, they are properly taxable.”); *Petroliam*  
26 *Nasional Berhad*, 2012 U.S. Dist. LEXIS 64555, at \*10-11 (allowing recovery of costs that were  
27 “necessary to convert computer data into a readable format,” because such costs were “an  
28 essential component of ‘[t]he cost of reproducing disclosure or formal discovery documents’



1 used in the case, as permitted under Civil Local Rule 54–3(d)(2).”); *Alzheimer’s Inst. of Am., Inc.*  
2 *v. Elan Corp. PLC*, No. C -10-00482-EDL, 2013 U.S. Dist LEXIS 31952, at \*16-17 (awarding  
3 costs in e-discovery for “.TIFF and OCR conversion, Bates stamping, load file and other  
4 physical media generation”); *Jardin v. DATAlegro*, No. 08–CV–1462-IEG (WVG), 2011 U.S.  
5 Dist. LEXIS 117517, \*15-22 (S.D. Cal. Oct. 12, 2011) (costs for processing and converting to  
6 TIFF format are recoverable); *SEIU*, 2010 U.S. Dist. LEXIS 122202, at \*12 (rejecting plaintiffs’  
7 argument that “the cost of trial exhibits and electronic discovery production should not be  
8 recoverable”).

9         33. During the preliminary injunction phase of the case, Samsung served two sets of  
10 requests for production of documents, with 30 individual document requests. Over the course of  
11 this litigation, Samsung subsequently served seven additional sets of requests for production of  
12 documents, with 553 individual document requests. In response to Samsung’s requests, Apple  
13 made 305 productions of documents, totaling 338,860 documents and 2,944,467 pages. Many of  
14 these documents were paper documents that required processing to be converted to electronic  
15 format for upload to Apple’s document repository system, which was hosted by Catalyst  
16 Repository Systems, Inc., Apple’s e-discovery vendor. In addition, Apple incurred processing  
17 costs in having paper and electronic documents loaded to the Catalyst document repository.

18         34. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
19 processing and uploading documents for production and producing documents is attached as  
20 Schedule B-4 to the Bill of Costs. Apple seeks only the amounts associated with electronic  
21 preparation and duplication, not the intellectual effort involved in the production, such as  
22 searching or analyzing the documents. Further, costs associated with hosting the data, software  
23 user license fees, and vendor consulting time are not included.

24         35. True and correct copies of invoices supporting the Morrison Costs in Schedule B-4  
25 are attached as Exhibit B-4 to the Bill of Costs. Included in Exhibit B-4 are invoices from the  
26 vendors that collected and processed the paper and electronic documents for upload to the  
27 Catalyst document repository.

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1                   **5. Electronic Discovery: Uploads/Productions (Catalyst)**  
2                   **(Schedule B-5)**

3           36. In addition to the electronic discovery costs discussed in Paragraphs 31 to 35  
4 regarding Schedule B-4, Apple seeks e-discovery costs charged by Catalyst associated with  
5 uploads and document productions in the amount of \$332,555.64 (Morrison Costs). (*See*  
6 *Schedule B-5.*)

7           37. As discussed above, many of the documents collected in response to Samsung's  
8 document requests were paper documents that required processing to be converted to electronic  
9 format for upload to the Catalyst document repository. In addition, Apple incurred processing  
10 costs in having paper and electronic documents loaded to the Catalyst document repository.  
11 Further, after documents were loaded to the Catalyst document repository and after responsive  
12 and non-privileged documents were identified, Apple incurred costs in producing these  
13 documents to Samsung.

14           38. A spreadsheet itemizing the recoverable Morrison Costs that Apple was charged  
15 by Catalyst related to uploading documents for production and producing documents is attached  
16 as Schedule B-5 to the Bill of Costs. Apple seeks only the amounts associated with electronic  
17 preparation, duplication, and production of documents, not the intellectual effort involved in the  
18 production, such as searching or analyzing the documents. Further, costs associated with hosting  
19 the data, software user license fees, and vendor consulting time are not included.

20           39. True and correct copies of invoices supporting the Morrison Costs in Schedule B-5  
21 are attached as Exhibit B-5 to the Bill of Costs. Included in Exhibit B-5 are invoices from  
22 Catalyst Repository Systems, Inc. for costs associated with uploading and producing documents.

23                   **6. Secure Room (Schedule B-6)**

24           40. Apple seeks costs of maintaining a secure room in the amount of \$99,910.17  
25 (Morrison Costs). (*See Schedule B-6.*)

26           41. Samsung demanded that Apple make available for inspection various prototypes  
27 and source code. Apple made available for Samsung's inspection various design prototypes at a  
28 secure facility. Unreleased design prototypes are among the most highly confidential material at

1 issue in the case. Moreover, many of the design prototypes are one-of-a-kind and cannot be  
2 replaced. Accordingly, it was necessary for physical prototypes to be inspected at a secure  
3 facility. To make prototypes available for Samsung's review upon demand, Apple placed the  
4 prototypes in a secure room with third-party vendor NCC Group, Inc. NCC was the same vendor  
5 that the parties previously selected to serve as the Court-ordered escrow provider for Computer-  
6 Aided Design (CAD) data.

7 42. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
8 maintaining a secure room to make available the prototypes that Samsung requested is attached  
9 as Schedule B-6 to the Bill of Costs.

10 43. True and correct copies of invoices supporting the Morrison Costs in Schedule B-6  
11 are attached as Exhibit B-6 to the Bill of Costs. Included in Exhibit B-6 are invoices from NCC,  
12 the vendor that provided the secure room.

13 **C. Interpreters at Deposition and Trial (Schedule C)**

14 44. Apple seeks costs for compensation of interpreters at deposition and trial in the  
15 amount of \$160,200.00 (Morrison Costs). (See Schedule C.)

16 45. Under 28 U.S.C. § 1920(6), “[c]ompensation of court appointed experts,  
17 compensation of interpreters, and salaries, fees, expenses, and costs of special interpretation  
18 services under section 1828 of this title” are taxable. The Supreme Court has recognized that  
19 compensation of oral translation may be awarded under 28 U.S.C. § 1920(6), although the cost  
20 of written document translation is not allowed under the statute. *Taniguchi v. Kan Pac. Saipan,*  
21 *Ltd.*, 132 S. Ct. 1997, 2002-07 (2012).

22 46. Most of Samsung's witnesses were Korean nationals and requested that an  
23 interpreter be provided at deposition and at trial. Apple took the deposition of 98 Samsung  
24 witnesses in this case, all of whom required an interpreter. In addition, one of Apple's witnesses,  
25 Shin Nishibori, required a Japanese interpreter.

26 47. A spreadsheet itemizing the recoverable Morrison Costs that Apple incurred in  
27 compensating interpreters used at deposition or at trial is attached as Schedule C to the Bill of  
28 Costs. Only the costs for interpretation services at deposition or at trial have been included.

1 Those entries are highlighted in yellow in the supporting invoices in Exhibit C. Incidental  
2 expenses (such as those relating to food and travel), per diem costs, and costs incurred for travel  
3 days and bridge (*i.e.*, intervening) days have not been included.

4 48. True and correct copies of invoices supporting the Morrison Costs in Schedule C  
5 are attached as Exhibit C to the Bill of Costs. Included in Exhibit C are invoices from various  
6 interpreters. AccessLink, LLC provided most of the interpretation services at depositions and at  
7 trial.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
9 5th day of December 2013 at San Francisco, California.

10  
11 /s/ Rachel Krevans  
Rachel Krevans

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