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 Counterdefendants Advanced Micro
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Attorneys for Defendants and Counterclaimants
 Samsung Electronics Co., Ltd., et al.

11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14

15 ADVANCED MICRO DEVICES, INC., et
 16 al.,

17 Plaintiffs,

18 v.

19 SAMSUNG ELECTRONICS CO., LTD.,
 20 et al.,

21 Defendants.

Case No. CV-08-0986-SI

**STIPULATION AND [PROPOSED]
 ORDER PERMITTING PROTECTED
 MATERIAL TO BE FILED UNDER SEAL**

[Civil L.R. 7-12]

22 Advanced Micro Devices, Inc. and ATI Technologies, ULC (collectively, “AMD”), and
 23 Samsung Electronics Co., Ltd.; Samsung Semiconductor, Inc.; Samsung Austin Semiconductor,
 24 LLC; Samsung Electronics America, Inc.; Samsung Telecommunications America, LLC;
 25 Samsung Techwin Co., Ltd.; and Samsung Opto-Electronics America, Inc. (collectively,
 26 “Samsung”) jointly submit this Stipulation regarding the filing of Protected Material under seal.
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1 WHEREAS, The Joint Stipulated Protective Order states that “a Party may not file in the
2 public record in this action any Protected Material or document summarizing, discussing or
3 otherwise referencing Protected Material.” Dkt. No. 60 at 12.

4 WHEREAS, Defendants and Counterclaimants’ Opening Claim Construction Brief
5 contains Highly Confidential AMD Protected Material.

6 WHEREAS, the parties acknowledge that AMD does not waive any right to later
7 challenge the inclusion of AMD Protected Material in Defendants and Counterclaimants’ Opening
8 Claim Construction Brief.

9 Pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by
10 and between AMD and Samsung that, subject to the Court’s approval, the unredacted version of
11 Defendants and Counterclaimants’ Opening Claim Construction Brief filed on March 16, 2009
12 shall be filed under seal, and the redacted version of this document shall be publicly filed with the
13 Court.

14
15 DATED: March 16, 2009

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

16
17 By: /s/ William Manning

18 William H. Manning
Samuel L. Walling

19 **ATTORNEYS FOR ADVANCED MICRO
20 DEVICES, INC. AND ATI TECHNOLOGIES,
21 ULC**

22 DATED: March 16, 2009

COVINGTON & BURLING LLP

23 By: /s/ Christine Saunders Haskett

24 Robert T. Haslam
Christine Saunders Haskett

25
26 **ATTORNEYS FOR SAMSUNG
27 ELECTRONICS CO., LTD.; SAMSUNG
28 SEMICONDUCTOR, INC.; SAMSUNG
AUSTIN SEMICONDUCTOR, LLC; SAMSUNG
ELECTRONICS AMERICA, INC.; SAMSUNG**

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**TELECOMMUNICATIONS AMERICA, LLC;
SAMSUNG TECHWIN CO., LTD.; AND
SAMSUNG OPTO-ELECTRONICS AMERICA,
INC.**

PURSUANT TO STIPULATION, IT IS SO ORDERED.



_____, 2009

Honorable Susan Illston
United States District Judge

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ECF CERTIFICATION

I, Christine Saunders Haskett, am the ECF User whose identification and password are being used to file this Stipulation regarding the the filing of Protected Material under seal In compliance with General Order 45.X.B, I hereby attest that William H. Manning has concurred in this filing.

DATED: March 16, 2009

COVINGTON & BURLING LLP

By /s Christine Saunders Haskett
CHRISTINE SAUNDERS HASKETT

Attorneys for Defendants and Counterclaimants
Samsung Electronics Co., Ltd., et al.