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

17 UNITED STATES DISTRICT COURT  
 18 NORTHERN DISTRICT OF CALIFORNIA

19 ADVANCED MICRO DEVICES, INC., et  
 20 al.,

21 Plaintiffs,

22 v.

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

24 Defendants.

Case No. CV-08-0986-SI

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

**[Civil L.R. 7-12]**

26 Advanced Micro Devices, Inc. and ATI Technologies, ULC (collectively, "AMD"), and  
 27 Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Austin Semiconductor,  
 28 LLC, Samsung Electronics America, Inc., Samsung Telecommunications America, LLC, and

1 Samsung Digital Imaging Co., Ltd. (collectively, “Samsung”) jointly submit this Stipulation  
2 regarding the filing of Protected Material under seal.

3 WHEREAS, The Joint Stipulated Protective Order states that “a Party may not file in the  
4 public record in this action any Protected Material or document summarizing, discussing or  
5 otherwise referencing Protected Material.” Dkt. No. 60 at 12.

6 WHEREAS, Defendants and Counterclaimants’ Opposition to Plaintiff AMD’s Motion  
7 for Summary Judgment of No Inequitable-Conduct Affirmative Defense Relating to U.S. Patent  
8 No. 5,559,990, Exhibits 5, 15, 16, 18, and 21 to the Declaration of Matthew C. Lapple in Support  
9 of Samsung’s Opposition to Plaintiff AMD’s Motion for Summary Judgment of No Inequitable-  
10 Conduct Affirmative Defense Relating to U.S. Patent No. 5,559,990 and the Declaration of  
11 Matthew C. Lapple in Support of Samsung’s Motion under FRCP 56(F) contain Highly  
12 Confidential AMD Protected Material.

13 Pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by  
14 and between AMD and Samsung that, subject to the Court’s approval, the unredacted version of  
15 Defendants and Counterclaimants’ Opposition to Plaintiff AMD’s Motion for Summary  
16 Judgment of No Inequitable-Conduct Affirmative Defense Relating to U.S. Patent No. 5,559,990,  
17 the unredacted version of Exhibits 5, 15, 16, 18, and 21 to the Declaration of Matthew C. Lapple  
18 in Support of Samsung’s Opposition to Plaintiff AMD’s Motion for Summary Judgment of No  
19 Inequitable-Conduct Affirmative Defense Relating to U.S. Patent No. 5,559,990 and the  
20 unredacted version of the Declaration of Matthew C. Lapple in Support of Samsung’s Motion  
21 under FRCP 56(F) shall be filed under seal, and the redacted version of these documents shall be  
22 publicly filed with the Court.

23 DATED: January 22, 2010

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

24 By: /s/ William H. Manning

25 William H. Manning  
26 Samuel L. Walling

27 **ATTORNEYS FOR ADVANCED MICRO**  
28 **DEVICES, INC. AND ATI TECHNOLOGIES,**  
**ULC**

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DATED: January 22, 2010

**COVINGTON & BURLING LLP**

By: /s/ Matthew C. Lapple

Robert T. Haslam  
Matthew C. Lapple

**ATTORNEYS FOR SAMSUNG  
ELECTRONICS CO., LTD.; SAMSUNG  
SEMICONDUCTOR, INC.; SAMSUNG  
AUSTIN SEMICONDUCTOR, LLC; SAMSUNG  
ELECTRONICS AMERICA, INC.; SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC;  
SAMSUNG DIGITAL IMAGING CO., LTD.**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

\_\_\_\_\_, 2010



Honorable Susan Illston  
United States District Judge

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**ECF CERTIFICATION**

I, Matthew C. Lapple, am the ECF User whose identification and password are being used to file this Stipulation regarding 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: January 22, 2010

**COVINGTON & BURLING LLP**

By /s/ Matthew C. Lapple

MATTHEW C. LAPPLE

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