

1 William H. Manning (*pro hac vice*)

E-mail: WHManning@rkmc.com

2 Brad P. Engdahl (*pro hac vice*)

E-mail: BPEngdahl@rkmc.com

3 Samuel L. Walling (*pro hac vice*)

E-mail: SLWalling@rkmc.com

4 **Robins, Kaplan, Miller & Ciresi L.L.P.**

2800 LaSalle Plaza

5 800 LaSalle Avenue

Minneapolis, MN 55402

6 Telephone: 612-349-8500

Facsimile: 612-339-4181

7 Attorneys for Plaintiffs and

8 Counterdefendants Advanced Micro

9 Devices, Inc., et al.

Robert T. Haslam (Bar No. 71134)

E-mail: Rhaslam@cov.com

Covington & Burling LLP

333 Twin Dolphin Drive, Suite 700

Redwood Shores, CA 94065

Telephone: 650-632-4700

Facsimile: 650-632-4800

Christine Saunders Haskett (Bar No. 188053)

E-mail: Chaskett@cov.com

Covington & Burling LLP

One Front Street

San Francisco, CA 94111

Telephone: 415-591-6000

Facsimile: 415-591-6091

Alan H. Blankenheimer (Bar No. 218713)

E-mail: ablankenheimer@cov.com

Laura E. Muschamp (Bar No. 228717)

E-mail: lmuschamp@cov.com

Jo Dale Carothers (Bar No. 228703)

E-mail: jcarothers@cov.com

Covington & Burling LLP

9191 Towne Centre Drive, 6th Floor

San Diego, CA 92122-1225

Telephone: 858-678-1800

Facsimile: 858-678-1600

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.,
24 et al.,

25 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

Case No. CV-08-0986-SI

STIP. AND [PROPOSED] ORDER RE FILING
PROTECTED MATERIAL UNDER SEAL

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' Supplemental Submission in Support of
7 Opposition to Plaintiff AMD's Motion for Summary Judgment of Inequitable-Conduct
8 Affirmative Defense Relating to U.S. Patent No. 5,559,990 and Exhibit A to the Declaration of
9 Laura E. Muschamp in Support of Samsung's Supplemental Submission in Support of Opposition
10 to Plaintiff AMD's Motion for Summary Judgment of Inequitable-Conduct Affirmative Defense
11 Relating to U.S. Patent No. 5,559,990 contain Highly Confidential AMD Protected Material.

12 Pursuant to Civil Local Rule 7-12, IT IS HEREBY STIPULATED AND AGREED, by
13 ~~and between AMD and Samsung that, subject to the Court's approval, the unredacted version of~~
14 ~~Defendants and Counterclaimants' Supplemental Submission in Support of Opposition to~~
15 ~~Plaintiff AMD's Motion for Summary Judgment of Inequitable-Conduct Affirmative Defense~~
16 ~~Relating to U.S. Patent No. 5,559,990 and Exhibit A to the Declaration of Laura E. Muschamp in~~
17 ~~Support of Samsung's Supplemental Submission in Support of Opposition to Plaintiff AMD's~~
18 ~~Motion for Summary Judgment of Inequitable-Conduct Affirmative Defense Relating to U.S.~~
19 ~~Patent No. 5,559,990 shall be filed under seal, and the redacted version of these documents shall~~
20 be publicly filed with the Court.

21 DATED: February 19, 2010

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

22 By: /s/ Samuel L. Walling
23 Brad P. Engdahl
24 Samuel L. Walling

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

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DATED: February 19, 2010

COVINGTON & BURLING LLP

By: /s/ Laura E. Muschamp

Robert T. Haslam
Laura E. Muschamp

**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, Laura E. Muschamp, 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 Samuel L. Walling has concurred in this filing.

DATED: February 19, 2010

COVINGTON & BURLING LLP

By /s/ Laura E. Muschamp
LAURA E. MUSCHAMP

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