

1 QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP  
 2 Harold A. Barza (Bar No. 80888)  
 halbarza@quinnemanuel.com  
 3 Amar L. Thakur (Bar No. 194025)  
 amarthakur@quinnemanuel.com  
 4 Vincent Pollmeier (Bar No. 210684)  
 vincentpollmeier@quinnemanuel.com  
 5 865 South Figueroa Street, 10<sup>th</sup> Floor  
 Los Angeles, California 90017-2543  
 6 Telephone: (213) 443-3000  
 Facsimile: (213) 443-3100

7 QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP  
 8 William O. Cooper (Bar No. 279385)  
 willcooper@quinnemanuel.com  
 9 Joseph B. Martin (Bar No. 284156)  
 jobymartin@quinnemanuel.com  
 10 50 California Street, 22nd Floor  
 San Francisco, California 94111  
 11 Telephone: (415) 875-6600  
 12 Facsimile: (415) 875-6700

13 Attorneys for Plaintiff,  
 Aylus Networks, Inc.

MARK D. FOWLER, Bar No. 124235  
 mark.fowler@dlapiper.com  
 CHRISTINE K. CORBETT, Bar No. 209128  
 christine.corbett@dlapiper.com  
 ROBERT BUERGI, Bar No. 242910  
 robert.buergi@dlapiper.com  
 ERIK R. FUEHRER, Bar No. 252578  
 erik.fuehrer@dlapiper.com  
 JONATHAN HICKS, Bar No. 274634  
 jonathan.hicks@dlapiper.com  
**DLA PIPER LLP (US)**  
 2000 University Avenue  
 East Palo Alto, CA 94303-2214  
 Telephone: 650.833.2000  
 Facsimile: 650.833.2001

ROBERT WILLIAMS, Bar No. 246990  
 robert.williams@dlapiper.com  
**DLA PIPER LLP (US)**  
 401 B Street, Suite 1700  
 San Diego, CA 92101-4297  
 Telephone: (619) 699-2700  
 Facsimile: (619) 699-2701

Attorneys for Defendant  
 APPLE INC.

15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN FRANCISCO DIVISION

19 Aylus Networks, Inc.,  
 20 Plaintiff,  
 21 vs.  
 22 Apple Inc.  
 23 Defendant.

CASE NO. 3:13-cv-4700-EMC

**JOINT STIPULATION AND ~~[PROPOSED]~~  
 ORDER REGARDING AUTHENTICITY  
 OF DOCUMENTS**

1 WHEREAS, Aylus Networks, Inc. (“Aylus”) commenced the above-captioned action (the  
2 “Litigation”) against Apple Inc. (“Apple,” and together with Aylus, “the Parties,” and individually  
3 each a “Party”) on October 9, 2013;

4 WHEREAS, the Parties subsequently have produced thousands of pages of documents in  
5 connection with discovery in the Litigation; and

7 WHEREAS, the Parties have determined that it is in their mutual interest to avoid the  
8 significant and unnecessary burden and expense associated with the document-by-document  
9 authentication of documents, and that stipulating to the authenticity of certain documents will  
10 promote the orderly and efficient progress of the Litigation.

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as  
12 follows:

13 1. Absent affirmative evidence that a document or thing is not what it purports to be,  
14 the Parties agree that documents produced by either Apple or Aylus in the Litigation will be  
15 presumed authentic for purposes of Rule 901 of the Federal Rules of Evidence.

17 2. The Parties agree that, absent affirmative evidence to the contrary, documents  
18 produced from the records of either Party are presumptively business records for purposes of Rule  
19 902(11).

20 3. Nothing in this stipulation shall be construed as an agreement that any documents  
21 or things that are subject to this stipulation are admissible into evidence by any Party, except as  
22 expressly addressed herein. The Parties hereby expressly reserve the right to object to the  
23 admissibility of any document or thing under any grounds permitted by law and not expressly  
24 addressed herein.  
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1 Dated: July 17, 2015

2 QUINN EMANUEL URQUHART &  
3 SULLIVAN, LLP

4 /s/ Amar L. Thakur

5 Harold A. Barza  
6 Amar L. Thakur  
7 Vincent Pollmeier

8 Attorneys for Plaintiff,  
9 Aylus Networks, Inc.

DLA PIPER LLP (US)

/s/ Christine K. Corbett

10 MARK D. FOWLER  
11 CHRISTINE K. CORBETT  
12 ROBERT BUERGI  
13 ROBERT WILLIAMS  
14 ERIK R. FUEHRER  
15 JONATHAN HICKS

16 Attorneys for Defendant,  
17 Apple Inc.

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**ATTESTATION CLAUSE**

I, Joseph B. Martin, am the ECF User whose identification and password are being used to file this Stipulated Protective Order. In compliance with Civil Rule 5-1(i)(3), I hereby attest that Christine K. Corbett and Amar L. Thakur have concurred in this filing.

Dated: July 17, 2015

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Joseph B. Martin

Joseph B. Martin  
Attorneys for Plaintiff,  
Aylus Networks, Inc

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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 7/17/15

By: \_\_\_\_\_

