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16	Attorneys for Defendants AMAZON.COM, INC., a Delaware corporation,			
17	and AMAZON DIGITAL SERVICES, ÎNC., a			
18	Delaware corporation			
19	UNITED STATES DISTRICT COURT			
20	NORTHERN DISTRICT OF CALIFORNIA			
21				
22	APPLE INC., a California corporation,	No. 11-cv-01327 PJH		
23	Plaintiff,	Action Filed: March 18, 2011		
24	v.	STIPULATED REQUEST FOR AN		
25	AMAZON.COM, INC., a Delaware corporation,	ORDER EXTENDING DISCOVERY DEADLINE AND [P ROPOSED] ORDER		
26	and AMAZON DIGITAL SERVICES, INC., a Delaware corporation,	(Local Rule 6-2)		
27	Defendants.			
28				
	STIPULATED REQ. TO EXTEND DISC. DEADLINE & [PROP.] ORDER 11 1327 PJH			

Pursuant to Civil Local Rule 6-2, IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys of record that, if the Court approves, the current fact discovery deadline in the above-captioned case be extended as set forth below. The stipulation is based on the following:

- 1. The parties are in the early stages of discovery.
- 2. Due to extensive negotiations, the parties only recently—on December 30, 2011—filed a Stipulated Protective Order governing confidential material in this case. Accordingly, no documents containing confidential material have been produced to date.
- 3. Because of these facts, the parties feel that fact discovery cannot be completed by the current deadline of February 15, 2012. The parties request an extension—to April 1, 2012—to complete fact discovery.
- 4. The parties have not previously requested any extensions to Court-ordered deadlines. The proposed change in the deadline for the close of fact discovery will not affect any other deadlines or the trial date set by the Court.
- 5. The current schedule and the proposed revised schedule that the parties have stipulated to are shown in the chart below.

Pre-trial Deadline	Current Schedule	Stipulated Proposed Schedule
Non-Expert Discovery Cutoff	02/15/2012	04/01/2012
Expert Disclosures	03/14/2012	03/14/2012
Expert Discovery Cutoff	05/02/2012	05/02/2012
Dispositive Motions To Be	06/13/2012	06/13/2012
Heard By		
Pre-Trial Conference	09/20/2012	09/20/2012
Trial Date	10/15/2012	10/15/2012

6. The parties respectfully request that the Court grant their request.

In accordance with N.D. Cal. General Order No. 45, Section X, the filer of this

1	document hereby attests that the concurrence to the filing of this document has been		
2	obtained from the other signatory hereto.		
3			
4	DATED: January 9, 2012. DAVID R. EBERHART RYAN J. PADDEN DAVID I SERANIK		
5	DAVID J. SEPANIK O'MELVENY & MYERS LLP		
6	By: /s/ David R. Fharhart		
7	By:/s/ David R. Eberhart DAVID R. EBERHART		
8	Attorneys for Plaintiff APPLE INC.		
9	DATED: January 9, 2012.		
10	Respectfully,		
11	MARTIN R. GLICK CLARA J. SHIN		
12	SARAH J. GIVAN ELIZABETH WANG		
13	ARNOLD & PORTER LLP		
14	By: /s/ Martin R. Glick MARTIN R. GLICK		
15	MARTIN R. GLICK		
1617	Attorneys for Defendants AMAZON.COM, INC., a Delaware corporation, and AMAZON DIGITAL SERVICES, INC., a Delaware corporation		
18	SERVICES, INC., a Delaware corporation ORDER [PROPOSED]		
19	Pursuant to stipulation, IT IS SO ORDERED.		
20	SIGNED on the 12th day of January , 2012.		
21			
22	THE HONORABLE PHYLLIS I HAMILTON		
23	Judgo United States District Court for the Northern District of California		
24	IT IS SO ORDERED		
25			
26	Judge Phyllis J. Hamilton		
27			
28	District OF CO		
	STIPULATED REQ. TO EXTEND DISC. DEADLINE PROPERTY 11 1327 PJH		