

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
6 Minneapolis, MN 55402
Telephone: 612-349-8500
Facsimile: 612-339-4181

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

9 Attorneys for Plaintiffs and
10 Counterdefendants Advanced Micro
Devices, Inc., et al.

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

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

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.
27
28

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

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

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

6 
7 _____, 2009

8 Honorable Susan Illston
9 United States District Judge
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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.