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8 Attorneys for Plaintiff  
 APPLE INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 APPLE INC., a California corporation,

13 Plaintiff,

14 v.

15 SAMSUNG ELECTRONICS CO., LTD., A  
 Korean business entity; SAMSUNG  
 16 ELECTRONICS AMERICA, INC., a New York  
 corporation; SAMSUNG  
 17 TELECOMMUNICATIONS AMERICA, LLC, a  
 Delaware limited liability company,

18 Defendants.  
 19

Case No. 4:11-cv-01846-LB

**[PROPOSED] ORDER GRANTING  
 PLAINTIFF'S MOTION TO  
 EXPEDITE DISCOVERY**

Date: May 3, 2011  
 Time: 9:00 a.m.  
 Place:  
 Judge:

20  
 21 Plaintiff Apple Inc. ("Apple") has moved the Court for an order to expedite discovery  
 22 regarding certain products soon to be released by Defendant Samsung Telecommunications  
 23 America, LLC ("Samsung").

24 Having considered the arguments of the parties and the papers submitted, and finding  
 25 good cause therefore, the Court hereby grants Apple's Motion to Expedite Discovery, and orders  
 26 Samsung to produce the following documents and things by May 17, 2011:  
 27  
 28

- 1 (1) a domestic production model<sup>1</sup> of the Galaxy S2, along with its commercial packaging  
2 and initial release marketing materials;
- 3 (2) a domestic production model of the Galaxy Tab 8.9, along with its commercial  
4 packaging and initial release marketing materials;
- 5 (3) a domestic production model of the Galaxy Tab 10.1, along with its commercial  
6 packaging and initial release marketing materials;
- 7 (4) a domestic production model of the Infuse 4G, along with its commercial packaging  
8 and initial release marketing materials;
- 9 (5) a domestic production model of the 4G LTE (or “Droid Charge”), along with its  
10 commercial packaging and initial release marketing materials; and
- 11 (6) documents relating to any copying of design elements of, or attempts to design around  
12 Apple’s intellectual property relating to, the iPhone 4, iPad, and iPad 2.

13 In addition, by May 19, 2011, Samsung shall make available for deposition in the United  
14 States a 30(b)(6) corporate witness on the following topics:

- 15 (a) The design of the shell and graphical user interface of the Galaxy S2, Galaxy Tab 8.9,  
16 Galaxy Tab 10.1, Infuse 4G, and 4G LTE;
- 17 (b) Any copying of design elements from the iPhone 4, iPad, and iPad 2; and
- 18 (c) Any attempts to design around the iPhone 4, iPad, and iPad 2.

19

20 **IT IS SO ORDERED.**

21

22 Dated: \_\_\_\_\_, 2011 By: \_\_\_\_\_  
23 Honorable \_\_\_\_\_

24

25

26 \_\_\_\_\_

27 <sup>1</sup> “Domestic Production Model” means a final, commercial version of a product to be sold  
28 in the United States.