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Attorneys for Plaintiff
 APPLE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC.,
 Plaintiff,
 v.
 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 Defendants.

Case No.: C-11-01846 (LHK)

**DECLARATION OF MICHAEL T. PIEJA
 IN SUPPORT OF THE JOINT
 STIPULATION AND
 [PROPOSED] ORDER REGARDING
 EXTENSION OF TIME**

Place: Courtroom 8, 4th Floor
 Judge: Hon. Lucy H. Koh

1 I, MICHAEL T. PIEJA, declare as follows:

2 1. I am an attorney with Bridges & Makrakakis, LLP, counsel for plaintiff Apple Inc.
3 (“Apple”) in this action. The facts set forth in this declaration are personally known to me to be
4 true and, if called upon to testify as to the matters contained herein, I could and would
5 competently testify thereto.

6 2. This declaration is submitted in support of the proposed stipulation and order filed
7 jointly by Apple and defendants Samsung Electronics Co. Ltd., Samsung Electronics America,
8 Inc., and Samsung Telecommunications America, LLC (collectively “Samsung”), requesting an
9 order from this Court extending the time for the briefing in connection with Samsung’s Motion to
10 Disqualify the law firm of Bridges & Makrakakis, LLP, filed on July 11, 2011 (the “Motion,”
11 Docket Item No. 101). On July 19, 2011, the Court rescheduled the hearing on the Motion from
12 August 18, 2011 to the afternoon of August 24, 2011 (Docket Item No. 116).

13 3. Apple filed its Complaint in this action on April 15, 2011, naming as defendants
14 Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
15 Telecommunications America, LLC.

16 4. On June 16, 2011, counsel from the law firm Bridges & Mavrakakis, LLP filed
17 notices of appearance on behalf of Apple.

18 5. On July 11, 2011 Samsung filed a Motion to Disqualify the Bridges & Mavrakakis,
19 LLP firm from representing Apple in this litigation, setting the hearing date for August 18, 2011.

20 6. On July 19, 2011, this Court continued the hearing on the Motion from August 18,
21 2011 to August 24, 2011, and a Clerk’s Notice was issued resetting deadlines as to the Motion
(Docket Item No, 116).

22 7. Pursuant to Civ. L. R. 7-3(a) the opposition to the Motion is currently due to be
23 filed on or before Monday, July 25, 2011. The reply to any opposition to the Motion is currently
24 due to be filed on or before Monday, August 1, 2011 (Civ. L. R. 7-3(c)).

25 8. Taylor & Company Law Offices, LLP is currently in the process of being retained
26 to assist the Bridges & Mavrakakis firm in responding to the Motion.

27 9. On June 19, 2011 counsel for Samsung agreed to a modification of the parties’
28 briefing schedule for the Motion, which will not affect the August 24, 2011 hearing date for the

1 Motion, and will still provide the Court with fifteen (15) days prior to the hearing in which to
2 consider all papers filed in connection with the Motion.

3 10. Pursuant to the parties agreed-upon modification of the briefing schedule, the
4 opposition to the Motion would be filed on or before August 1, 2011, and the reply would be filed
5 on or before August 8, 2011.

6 11. Previous time modifications in the case, whether by stipulation or Court order,
7 include the following:

- 8 (a) On April 19, 2011, Apple filed a motion to shorten time for briefing and
9 hearing on its simultaneously filed motion to expedite discovery. (Docket
10 Item Nos. 10-13.)
- 11 (b) On May 9, 2011, Apple and Samsung stipulated and agreed that the time for
12 Samsung to serve responsive pleadings pursuant to Rule 12(a) shall be 75
13 days after April 21, 2011. On May 10, 2011, the Court signed the
14 Stipulation and Order regarding an extension of time for Samsung to serve
15 responsive pleadings. (Docket Item No. 40.)
- 16 (c) On May 27, 2011, Samsung moved to shorten time for a hearing and
17 briefing on a Motion to Compel. On June 1, 2011, the Court granted in part
18 Samsung's motion to shorten time. (Docket Item No. 59.)
- 19 (d) On July 18, 2011 the Court ordered a briefing schedule related to expedited
20 discovery and Apple's motion for a preliminary injunction, setting dates
21 from July 2011 through the October 13, 2011 hearing on Apple's Motion
22 for Preliminary Injunction. (Docket Item No. 115.)

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12. The modification of the briefing schedule that is requested in the instant proposed stipulation will have no effect on the schedule for the case.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 20th day of July, 2011, at Palo Alto, California.

/S/Michael T. Pieja
MICHAEL T. PIEJA

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ECF ATTESTATION

I, MICHAEL T. PIEJA, am the ECF User whose ID and password are being used to file this **DECLARATION OF MICHAEL T. PIEJA IN SUPPORT OF THE JOINT STIPULATION AND [PROPOSED] ORDER REGARDING EXTENSION OF TIME**. In compliance with General Order 45, X.B., I hereby attest that Victoria Maroulis has concurred in this filing.

Dated: July 20, 2011

MICHAEL T. PIEJA
BRIDGES & MAVRAKAKIS LLP

By: /s/ Michael T. Pieja