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 TELECOMMUNICATIONS AMERICA, LLC

10 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

17 APPLE INC., a California corporation,
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 Plaintiff,
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 v.
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 21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 22 AMERICA, INC., a New York corporation; and
 SAMSUNG TELECOMMUNICATIONS
 23 AMERICA, LLC, a Delaware limited liability
 company,
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 Defendants.
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Case No. 11-cv-01846-LHK (PSG)

**JOINT STIPULATION AND
 [PROPOSED] ORDER
 REGARDING SCOPE OF
 DEPOSITIONS**

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2 *Counterclaim-Defendant APPLE INC.*

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1 The parties, through their respective counsel of record, hereby stipulate and agree as
2 follows:

3 WHEREAS, Apple Inc. (“Apple”) commenced the above-captioned action (the
4 “Litigation”) against Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and
5 Samsung Telecommunications America, LLC (collectively “Samsung,” and together with Apple,
6 “the parties” and individually each a “Party”) on April 15, 2011;

7 WHEREAS, on May 17, 2012, the parties each filed a Motion to Strike (Dkt. Nos. 934 and
8 939), seeking to strike and preclude portions of certain expert reports.

9 WHEREAS, on June 27, 2012, the Court issued an Order Granting-in-Part and Denying-
10 in-Part Motion to Strike Expert Reports (Dkt. No. 1144) (“Order”), and ordered that Stephen Gray
11 and Dr. Ravin Balakrishnan sit for an additional two hours of deposition and that Michael Wagner
12 sit for an additional three hours of deposition;

13 WHEREAS, the parties understand that the additional depositions described in the Court’s
14 Order are limited to the topics at issue in the Parties’ Motions to Strike;

15 WHEREAS, the Court’s Order called for the depositions to be completed on or before
16 July 13, 2012;

17 WHEREAS, the parties agree to extend the deadline for completing these three depositions
18 through July 17, 2012 to accommodate the schedules of the experts being deposed, and that such
19 delay will not otherwise impact the schedule or any other deadlines in this Litigation;

20 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties as
21 follows:

22 1. The deposition of Dr. Ravin Balakrishnan shall be limited in scope to the products
23 considered by him in forming his infringement position regarding U.S. Patent No. 7,469,381;

24 2. The deposition of Stephen Gray shall be limited in scope to the non-infringement
25 theories and opinions in Mr. Gray’s supplemental expert report and to his examination of accused
26 products relating to the opinions expressed in that supplemental report;

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1 3. The deposition of Michael Wagner shall be limited in scope to three hours on his
2 Supplemental Expert Report and his alternative damages model in Tab 6 of his rebuttal expert
3 report; and

4 4. The depositions of the aforementioned experts may occur up to, and including,
5 July 17, 2012.

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Dated: July 11, 2012

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ATTESTATION

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Joint Stipulation. In compliance with General Order 45, X.B., I hereby attest that Victoria F. Maroulis has concurred in this filing.

Dated: July 10, 2012

/s/ Michael A. Jacobs
Michael A. Jacobs

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[PROPOSED] ORDER

Pursuant to stipulation,
IT IS SO ORDERED.

Dated: July ____, 2012

The Honorable Paul S. Grewal
United States Magistrate Judge