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 14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC

16
 17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19
 20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 24 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 25 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

26 Defendant.
 27

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF JON STEIGER IN
 SUPPORT OF JOINT STIPULATION
 REGARDING STIPULATED AND
 DISPUTED JURY INSTRUCTION
 FILING DEADLINE**

1 I, Jon Steiger, declare as follows:

2 1. I am a member of the State Bar of California and a partner with Quinn
3 Emanuel Urquhart & Sullivan LLP, attorneys for Samsung Electronics Co., Ltd., Samsung
4 Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively,
5 “Samsung”). I make this declaration of personal, firsthand knowledge, and if called and sworn as
6 a witness, I could and would testify competently thereto.

7 2. On May 3, 2012, the Court held a case management conference with
8 counsel for Samsung and Apple Inc. (“Apple”).

9 3. The Court issued an Order, dated May 2, adopting the parties’ pretrial
10 deadlines for various filings, including the parties’ stipulated and disputed proposed jury
11 instructions. (Dkt. No. 901.) The Court ordered that the parties file proposed jury instructions by
12 July 11, 2012. (*Id.*)

13 4. On June 29, 2012, the Court held an additional case management
14 conference with counsel for the parties.

15 5. The Court issued an Order, dated July 9, 2012, confirming the deadline for
16 filing proposed jury instructions and ordering the parties to provide the Court with four binders
17 containing the parties’ stipulated and disputed proposed jury instructions. (Dkt. No. 1197.)

18 6. The parties first exchanged proposed jury instructions on July 6, 2012 and
19 have worked diligently since then to try and resolved disputes regarding the proposed jury
20 instructions.

21 7. Given the numerous other pre-trial deadlines and the complexities of the
22 parties’ claims and defenses, despite their best efforts, the parties were not able to file the joint
23 proposed jury instructions by July 11, 2012.

24 8. After meeting and conferring, the parties agree that a short, 36-hour
25 extension is required to file the joint proposed jury instructions.

26 9. The parties propose that the joint proposed jury instructions be filed by
27 12:00 p.m. on July 13, 2012, and that the binders with the stipulated and disputed proposed jury
28 instructions be lodged with the Court by 3:00 p.m. on July 13, 2012.

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10. The Court has granted several motions filed by both parties to shorten time on discovery motions. For example, Apple filed a motion to compel on December 8, 2011 and Samsung filed a motion to compel on December 12, 2011. In both cases, the moving party sought and was granted the requested Order shortening time.

11. The requested time modification will not affect the overall 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 July 12, 2012, at Los Angeles, California.

/s/ Jon Steiger
Jon Steiger

