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8 Attorneys for Non-Party  
 9 INTERNATIONAL BUSINESS MACHINES CORPORATION

10 UNITED STATES DISTRICT COURT  
 11  
 12 NORTHERN DISTRICT OF CALIFORNIA

13  
 14 APPLE, INC., a California corporation,

15 Plaintiff,

16 v.

17 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG  
 18 ELECTRONICS AMERIA, INC. a New York  
 corporation; SAMSUNG  
 19 TELECOMMUNICATIONS AMERICA,  
 20 LLC., a Delaware limited liability company,

21 Defendants.

Case No. 11-cv-01846-LHK

JOINT STIPULATION AND  
 [PROPOSED] ORDER GRANTING  
 NON-PARTY INTERNATIONAL  
 BUSINESS MACHINES  
 CORPORATION'S EMERGENCY  
 ADMINISTRATIVE MOTION FOR A  
 LIMITED SEALING ORDER

Judge: Hon. Judge Lucy H. Koh

22 WHEREAS Defendant Samsung has designated a potential trial exhibit, No. 630, that  
 23 includes a table summarizing certain payment terms of a December 22, 2010 IBM-Samsung  
 24 Patent License Agreement ("PLA"), attached as Exhibit 3A to Samsung's Expert Report of  
 25 David Teece, dated March 22, 2012;

26 WHEREAS IBM will move for an order to seal a portion of these materials;  
 27  
 28

1 WHEREAS Samsung and IBM<sup>1</sup> agree that portions of these materials are sealable;  
2 NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED that Samsung  
3 and IBM do not oppose the following materials being sealed as follows:

4 (a) the specific amounts in the column entitled "Payments" in the a table summarizing  
5 certain terms of a December 22, 2010 IBM-Samsung Patent License Agreement ("PLA"),  
6 attached as Exhibit 3A to Samsung's Expert Report of David Teece, dated March 22, 2012,  
7 proposed trial exhibit No. 630.

8  
9 Dated: July 26, 2012

10  
11 KING & SPALDING LLP

12  
13 By: /s/ Timothy T. Scott  
TIMOTHY T. SCOTT

14 Attorneys for Non-Party IBM

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16 QUINN EMANUEL URQUHART & SULLIVAN, LLP

17  
18 By: /s/ Victoria Maroulis  
19 CHARLES K. VERHOEVEN  
20 KEVIN P.B. JOHNSON  
VICTORIA F. MAROULIS  
MICHAEL T. ZELLER

21 Attorneys for SAMSUNG ELECTRONICS  
22 CO. LTD, SAMSUNG ELECTRONICS  
23 AMERICA, INC., AND SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC.

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28 <sup>1</sup> Counsel for Third Party Intervener Reuters America suggested that they would not stipulate to the sealing of this portion of Exhibit No. 630. Apple's counsel did not respond to our request for a stipulation.

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**ATTESTATION OF E-FILED SIGNATURE**

I, Timothy T. Scott, am the ECF User whose identification and password are being used to file this Stipulation. In compliance with General Order 45, I hereby attest that Victoria Maroulis concurred with this filing.

KING & SPALDING LLP

By: /s/ Timothy T. Scott  
TIMOTHY T. SCOTT

Attorneys for Non-Party IBM

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**[PROPOSED] ORDER**

Pursuant to stipulation,  
IT IS SO ORDERED.

Dated: July \_\_\_\_\_, 2012

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LUCY H. KOH  
United States District Judge