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 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.

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

**[PROPOSED] ORDER GRANTING
 APPLE'S MOTION TO COMPEL
 SAMSUNG TO PRODUCE
 DOCUMENTS AND PROVIDE
 RESPONSIVE ANSWERS TO
 PROPOUNDED DISCOVERY**

Date: October 25, 2011
 Time: 10:00 a.m.
 Courtroom: 5, 4th Floor
 Judge: Hon. Paul S. Grewal

1 Plaintiff Apple Inc. (“Apple”) has moved pursuant to Civil Local Rule 37 for an order
2 compelling Defendants Samsung Electronics Co., Ltd, Samsung Electronics America, Inc., and
3 Samsung Telecommunications America, LLC (collectively, “Samsung”) to produce all
4 documents and things responsive to various Apple Requests for Production. Apple also seeks an
5 order compelling Samsung to produce a witness to testify to the subject matter of these various
6 requests as well to Samsung’s efforts to fulfill its discovery obligations with respect to these
7 requests.

8 Having considered the arguments of the parties and the papers submitted, and finding
9 good cause therefore, the Court hereby GRANTS Apple’s Motion to Compel Samsung to
10 Produce Documents and Provide Responsive Answers to Propounded Discovery, and ORDERS
11 the following:

12 That by no later than September 27, 2011, Samsung shall produce to Apple all non-
13 privileged documents within its possession, custody, or control responsive to each of Apples
14 Requests for Production Nos. 1, 166, 206, 214, and 215;

15 That counsel for Samsung shall set forth in a certified statement accompanying its
16 September 27 production that the obligations of discovery have been met by Samsung as to all
17 documents, including those in Korea; and

18 That Samsung shall make available by no later than September 29, 2011, a witness
19 prepared to testify as to the subject matter of the aforementioned Requests for Production and as
20 to the efforts Samsung made to satisfy its discovery obligations pursuant to this Order.

21 **IT IS SO ORDERED.**

22
23
24 Dated: _____, 2011

By: _____

Honorable Paul S. Grewal, U.S.M.J.