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 Counterclaim-Defendant APPLE INC.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN JOSE DIVISION

15 APPLE INC., a California corporation,
 16 Plaintiff,
 17 v.
 18 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 19 AMERICA, INC., a New York corporation; and
 SAMSUNG TELECOMMUNICATIONS
 20 AMERICA LLC, a Delaware limited liability
 company,
 21 Defendants.

Case No. 11-cv-01846-LHK

**DECLARATION OF TERESA N.
 BURLISON IN SUPPORT OF
 STIPULATION AND
 [PROPOSED] ORDER
 EXTENDING DEADLINE FOR
 DEPOSITIONS OF INVENTORS
 OF APPLE'S PATENTS
 PURSUANT TO CIVIL L.R. 6-
 2(A)**

Trial Date: July 30, 2012

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I, Teresa N. Burlison, declare as follows:

1. I am an associate at the law firm of Morrison & Foerster LLP, counsel of record in this action for plaintiff Apple Inc. (“Apple”). I submit this declaration in support of the parties’ stipulation and proposed order extending the deadline for the depositions of several of the inventors of Apple’s patents, pursuant to Civil L.R. 6-2. Unless otherwise indicated, I have personal knowledge of the matters set forth below. If called as a witness I could and would testify competently as follows.

2. On August 24, 2011, the Court granted an expedited trial schedule as to Apple’s claims and Samsung’s counterclaims.

3. On August 25, 2011, the Court entered a Minute Order and Case Management Order (“Order”). *See* Docket No. 187. The Court ordered that the depositions of the inventors and prosecuting attorneys for Apple’s patents must be completed by November 1, 2011.

4. Since the Court’s Order, Apple has worked in good faith with Samsung to schedule the depositions of its inventors and prosecuting attorneys. Despite the parties’ best efforts, however, they have not been able to schedule the depositions of inventors Jonathan Ive, Douglas Satzger, Shin Nishibori, and Christopher Stringer before November 1, 2011.

5. Mr. Satzger is a former Apple employee represented by separate counsel. He is unable to sit for deposition before November 1 because, during the month of October, his lawyer has a full deposition schedule in a separate class action matter.

6. Mr. Nishibori is unable to sit for deposition before November 1 because he currently is on a voluntary leave of absence from Apple.

7. Mr. Ive is unable to sit for deposition before November 1 for personal reasons.

8. Mr. Stringer is unable to sit for deposition before November 1 because of work and scheduling conflicts.

9. The parties have not previously modified the Court’s August 25, 2011 Order, and the requested modification should not have any effect on the remainder of the schedule for this case.

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I declare under the penalty of perjury that the foregoing is true and correct and that this Declaration was executed this 17th day of October 2011, at Palo Alto, California.

By: /s/ Teresa N. Burlison
Teresa N. Burlison

General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Teresa N. Burlison has concurred in this filing.

/s/ Victoria Maroulis