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Attorneys for Plaintiff and
Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendants.

Case No. 11-cv-01846-LHK

**APPLE'S OPPOSITION TO SAMSUNG'S
MOTION TO SHORTEN TIME ON
MOTION TO COMPEL APPLE TO
PRODUCE DOCUMENTS AND THINGS**

Date: November 1, 2011
Time: 3:00 p.m.
Place: Courtroom 5
Judge: Hon. Paul S. Grewal

1 Samsung has moved to shorten time on a motion to compel that it delivered just before
2 midnight on Friday night, October 28. Samsung requests that Apple's opposition be due Monday,
3 October 31, 2011, at 4:00 p.m.

4 Samsung's motion to compel is unnecessary and inconsistent with the parties' lead
5 counsel meet and confer discussions on Thursday, and plainly a reaction to Apple's motion for a
6 protective order filed Thursday morning. As of earlier in the day Friday, the parties had initiated
7 steps based on meet and confer discussions that appeared to satisfy both parties regarding the
8 issues raised by Samsung's motion. Apple agreed to provide all of the requested items that it
9 could locate and agreed to describe its search in an interrogatory response to be delivered on
10 shortened time.

11 Since then, Apple has continued to search for and make available materials that would be
12 responsive to Samsung's requests, including over the weekend, when Apple made additional
13 items available for Samsung to inspect at Morrison & Foerster offices. That inspection occurred
14 Sunday at 1:00 pm in Morrison & Foerster's Palo Alto office.

15 Apple is also preparing a response that explains its search and these events. There is no
16 need for a motion, let alone a request to shorten time, and Samsung's request should be denied.

17 If, however, the Court believes that the request to shorten time should be granted, Apple
18 requests that it have until 9:00 p.m. Monday to file its opposition and until 8:00 a.m. (or whatever
19 hour in the morning the Court would request) on Tuesday to lodge its opposition and supporting
20 papers. Apple will provide courtesy copies of the papers being lodged directly to Chambers. The
21 additional time is necessary so that Apple can gather and submit complete and accurate
22 responsive information.

23 Dated: October 31, 2011

MORRISON & FOERSTER LLP

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25 By: /s/ Michael A. Jacobs
Michael A. Jacobs

26
27 Attorneys for Plaintiff
APPLE INC.