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8 Attorneys for Plaintiff  
 APPLE INC.

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

13 SAN JOSE DIVISION

15 APPLE INC.,

16 Plaintiff,

17 v.

18 SAMSUNG ELECTRONICS CO., LTD., A  
 19 Korean business entity; SAMSUNG  
 ELECTRONICS AMERICA, INC., a New York  
 20 corporation; SAMSUNG  
 TELECOMMUNICATIONS AMERICA, LLC, a  
 21 Delaware limited liability company.,

22 Defendants.

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

**STIPULATION AND  
 [PROPOSED] ORDER**

Place: Courtroom 4, 5th Floor  
 Judge: Hon. Lucy H. Koh

23  
 24 **STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE OF PROCESS**

25 WHEREAS, plaintiff Apple Inc. (“Apple”) filed its complaint on April 15, 2011, naming  
 26 as defendants Samsung Electronics Co. LTD (“SEC”), Samsung Electronics America, Inc.  
 27 (“SEA”), and Samsung Telecommunications America, LLC (“STA”) (collectively, the “Samsung  
 28 Entities”) (D.I. 1);

1           WHEREAS, on April 21, 2011, the summons and complaint were served on SEA and  
2 STA (D.I. 17-18);

3           WHEREAS, the summons and complaint have not yet been served on SEC, a Korean  
4 business entity;

5           WHEREAS, the Court has directed Apple to serve SEC as soon as possible (D.I. 26);

6           WHEREAS, the parties seek to eliminate the time and expense associated with service of  
7 process abroad;

8           NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

9           I)       The undersigned attorneys from Quinn Emanuel Urquhart & Sullivan, LLP,  
10 counsel of record for the Samsung Entities, hereby accept service on behalf of Defendant SEC;

11           II)      Defendant SEC waives additional service requirements of the summons and  
12 complaint, if any, which may be required under the laws of the United States, South Korea, or any  
13 other jurisdiction;

14           III)     Notwithstanding the times set forth in Rule 12(a)(1)(A), the time for the Samsung  
15 Entities to serve responsive pleadings pursuant to Rule 12(a) shall be 75 days after April 21,  
16 2011;

17           IV)     No other dates or deadlines shall be modified by this stipulation and order; and

18           V)      This extension of time is without prejudice to Apple, and shall not be construed or  
19 otherwise used in any way to support a contention of delay, untimeliness, or lack of irreparable  
20 harm to Apple arising from the acts alleged in this action. Nor shall this extension be construed  
21 or argued to relieve the Samsung Entities from participating in any proceedings occurring prior to  
22 the filing of their responsive pleadings.

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Dated: May 9, 2011

MORRISON & FOERSTER LLP

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By:     /s/ Michael A. Jacobs\_  
HAROLD J. MCELHINNY  
MICHAEL A. JACOBS  
JENNIFER LEE TAYLOR  
JASON R. BARTLETT

By:     /s/ Victoria Maroulis\_\_\_\_\_  
CHARLES K. VERHOEVEN  
KEVIN P.B. JOHNSON  
VICTORIA F. MAROULIS  
EDWARD DEFRANCO  
MICHAEL T. ZELLER

Attorneys for Plaintiff  
APPLE INC.

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

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**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2011      By: \_\_\_\_\_

Honorable Lucy H. Koh

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**ECF ATTESTATION**

I, JASON R. BARTLETT, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that Michael Jacobs and Victoria Maroulis have concurred in this filing.

Dated: May 9, 2011

**JASON R. BARTLETT  
MORRISON & FOERSTER LLP**

By: /s/ Jason R. Bartlett  
JASON R. BARTLETT