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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,

vs.

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

Defendants.

Civil Action No. 11-CV-01846-LHK

**COUNTERCLAIM-DEFENDANT APPLE
INC.'S NOTICE OF FILING OF APPLE'S
AMENDED COUNTERCLAIMS IN
REPLY**

1 SAMSUNG ELECTRONICS CO., LTD., a
2 Korean business entity, SAMSUNG
3 ELECTRONICS AMERICA, INC., a New
4 York corporation, and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

5 Counterclaim-Plaintiffs,

6 v.

7 APPLE INC., a California corporation,

8 Counterclaim-Defendant.
9

10 **NOTICE OF FILING OF APPLE'S AMENDED COUNTERCLAIMS IN REPLY**

11 On October 18, 2011, the Court ordered Apple to file its Amended Answer, Defenses,
12 and Counterclaims in Reply to Samsung's Counterclaims (the "Amended Counterclaims in
13 Reply") by November 8. On October 28, 2011, Apple filed an unopposed motion for leave to
14 file its Amended Counterclaims in Reply, in case the allegations in the proposed Amended
15 Counterclaims in Reply were deemed to exceed the scope of the leave to amend specified in the
16 Court's October 18 Order. That motion is pending. In an abundance of caution, to avoid any
17 issue with respect to Apple's compliance with the October 18, 2011 Order, and because
18 Samsung's agreement not to oppose that motion serves as written consent to the amendment
19 under Fed. R. Civ. P. 15 (a)(2), Apple is today filing its proposed Amended Counterclaims in
20 Reply.
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1 Dated: November 8, 2011

/s/ Mark D. Selwyn
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on November 8, 2011, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Mark D. Selwyn
Mark D. Selwyn