

Exhibit D

From: Mazza, Mia
Sent: Monday, December 05, 2011 9:27 PM
To: 'rachelkassabian@quinnemanuel.com'; 'samsungv.apple@quinnemanuel.com'
Cc: AppleMoFo; 'sam.maselli@wilmerhale.com'; 'calvin.walden@wilmerhale.com';
'peter.kolovos@wilmerhale.com'
Subject: Apple v. Samsung: Proposed Stipulated Motion for Administrative Relief
Attachments: 2011-12-05 Mtn for Admin Relief re Telephonic M&C.pdf

Counsel:

Attached please find Apple's proposed Stipulated Motion for Administrative Relief regarding a telephonic meet-and-confer this week.

Please let me know by 3pm Pacific time on Tuesday, December 6, 2011, whether Samsung will join this Stipulated Motion.

If we do not hear from you by then we will assume Samsung opposes the Motion.



2011-12-05 Mtn for
Admin Relie...

Regards,

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Attorneys for Plaintiff and
Counterclaim-Defendant APPLE INC.

10 UNITED STATES DISTRICT COURT
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13 NORTHERN DISTRICT OF CALIFORNIA
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15 SAN JOSE DIVISION

16 APPLE INC., a California corporation,

17 Plaintiff,

18 v.

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

22 Defendants.
23

Case No. 11-cv-01846-LHK

**APPLE'S STIPULATED MOTION
FOR ADMINISTRATIVE RELIEF
REGARDING TELEPHONIC
MEET AND CONFER;
PROPOSED ORDER**

24 In accordance with Civil Local Rules 7-11 and 7-12, Apple Inc. ("Apple") and Samsung
25 Electronics Co., Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA"), and Samsung
26 Telecommunications America, LLC ("STA") (collectively, "Samsung"), through their respective
27 counsel, stipulate and request administrative relief as follows:
28

1 WHEREAS, pursuant to the Court's August 25, 2011 Minute Order and Case
2 Management Order, lead trial counsel for all parties must meet and confer in person before filing
3 any discovery motions;

4 WHEREAS, Apple has determined, after substantial meet-and-confer discussions amongst
5 non-lead trial counsel, that a discovery motion is necessary to resolve certain disputes before the
6 winter holidays;

7 WHEREAS, Judge Grewal is unavailable the week of December 19, 2011, and counsel
8 for Samsung represents that it is unavailable the week of December 26, 2011. As a result, any
9 motion not heard by December 16, 2011 may not be heard until January 2012; and

10 WHEREAS, Samsung's lead trial counsel is currently in trial on the East Coast and states
11 that he is unavailable to meet in person until December 19, 2011;

12 NOW, THEREFORE, given the limitations described above, the parties stipulate, subject
13 to approval by the Court, that the required lead trial counsel meet-and-confer discussion relating
14 to the upcoming discovery motion may take place via telephone or (if available) videoconference.

15 IT IS SO STIPULATED:

16 Dated: December 5, 2011

MORRISON & FOERSTER LLP

17

By: /s/ Michael Jacobs

18

Michael Jacobs

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Attorney for Plaintiff APPLE INC.

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Dated: December 5, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By: _____

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Attorney for Defendants, SAMSUNG
ELECTRONICS AMERICA, INC. AND
SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC

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PURSUANT TO STIPULATION, IT IS SO ORDERED:

DATED: _____, 2011

The Honorable Lucy H. Koh
United States District Court Judge