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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; SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendants.

CASE NO. 11-cv-01846-LHK-PSG

**[PROPOSED] ORDER GRANTING
SAMSUNG’S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
THINGS AND PROVIDE RESPONSIVE
ANSWERS TO PROPOUNDED
DISCOVERY**

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung
Telecommunications America, LLC (collectively, “Samsung”) have filed Samsung’s Motion to
Compel Production of Documents and Things and Responsive Answers to Propounded Discovery.

Having considered the arguments of the parties and the papers submitted, and
GOOD CAUSE HAVING BEEN SHOWN, the Court hereby GRANTS Samsung's Motion to
Compel Production of Documents and Things and Provide Responsive Answers to Propounded
Discovery as follows:

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IT IS ORDERED that by **no later than December 23, 2011 (or by December 18, 2011 if needed for claim construction briefing)**, Apple shall substantially complete its production to Samsung of the following documents:

(1) documents and thing related to Apple’s asserted utility patents, including all pleadings, discovery, transcripts, statements and briefs relating to the ‘002 patent, the ‘607 patent, and the ‘828 patent in two actions where Apple asserted these patents against Motorola; source code, and a working copy of Mac OS 10.0, prior art to the ‘891 patent; and source code for SuperClock, prior art to the ‘002 patent;

(2) documents and things related to Apple’s asserted design patents, including memory cards containing photographs of Apple’s tablet mockups; CAD drawings, model shop orders and records and other materials regarding Apple’s tablet mockups; de-designated copies of photographs; a supplemental response to Samsung's interrogatory No. 1; fulsome copies of Apple’s design inventor sketchbooks (excluding future products); documents and things related to smartphone prior art and evidence; and documents, models, and prototypes relating to Apple’s 1989 flat panel display and the Apple Cinema Display; and

(3) transcripts of prior testimony of Apple witnesses where they testified in their capacity as Apple employees.

IT IS SO ORDERED.

DATED: December ____, 2011

The Honorable Paul S. Grewal
United States Magistrate Judge