

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS
 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**SAMSUNG' MOTION TO SHORTEN
 TIME FOR BRIEFING AND HEARING
 ON ITS MOTION TO EXTEND TIME
 FOR COMPLIANCE WITH CERTAIN
 DEADLINES SET BY THE COURT'S
 DECEMBER 22, 2011 ORDER**

1 Pursuant to Civil L.R. 6-3, Defendants Samsung Electronics Co. Ltd., Samsung Electronics
2 America, Inc., and Samsung Telecommunications America, LLC (collectively, “Samsung”)
3 hereby bring this motion to shorten time for briefing and hearing on Samsung’s Motion to Extend
4 Time for Compliance with Certain Deadlines Set by the Court’s December 22, 2011 Order
5 (“Motion to Extend Time”). Specifically, Samsung requests that:

- 6 1. Apple’s opposition to the Motion to Extend Time be filed by 2:00 p.m. on Friday,
7 December 30, 2011; and
- 8 2. The Court decide the matter without a hearing.

9 The requested relief is necessary because despite round-the-clock efforts to meet the
10 December 31, 2011 deadline in question, it has become clear to Samsung that it will be physically
11 impossible to complete production of a discrete subset of documents subject to that deadline.
12 Samsung therefore seeks a short extension for production of this subset of documents, which
13 extension will have no impact on the Court’s schedule or on the scheduled depositions of various
14 Samsung witnesses.

15 If Samsung’s Motion to Extend Time were decided according to the schedule set forth in
16 Local Rule 6-3(c), Apple’s opposition would not be due until after the December 31, 2011
17 deadline has passed. Such a result would be inequitable and prejudicial to Samsung, especially
18 given the extensive efforts Samsung has made and the substantial cost it has incurred in producing
19 the vast majority of documents in accordance with the Court’s December 31 deadline.
20 Furthermore, at Apple’s request, the Court has recently granted expedited briefing on Apple
21 motions that dealt with issues far more complex than those raised in Samsung’s Motion to Extend
22 Time. (*See, e.g.*, Dkt. No. 332.)

23 As soon as it became clear to Samsung that some documents subject to the Court’s Order
24 could not be produced by December 31, 2011 deadline, counsel for Samsung contacted counsel for
25 Apple to seek a stipulation regarding (1) an extension of that deadline, and/or (2) a shortened
26 briefing schedule on Samsung’s Motion to Extend Time. Apple responded on December 29,
27 2011 at 1:43 p.m., stating without explanation that Apple opposed both requests.

28 For the foregoing reasons, Samsung respectfully requests that the Court grant Samsung’s

1 Motion to Shorten Time For Briefing and Hearing On Samsung's Motion to Extend Time For
2 Compliance With Certain Deadlines Set by the Court's December 22, 2011 Order.

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DATED: December 29, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Victoria F. Maroulis
Charles K. Verhoeven
Kevin P.B. Johnson
Victoria F. Maroulis
Michael T. Zeller

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