

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Charles K. Verhoeven (Cal. Bar No. 170151)  
 2 charlesverhoeven@quinnemanuel.com  
 50 California Street, 22<sup>nd</sup> 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 5<sup>th</sup> 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 America, Inc., and Samsung  
 14 Telecommunications America, LLC

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

17 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK

18 Plaintiff,

19 vs.

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

**[PROPOSED] ORDER GRANTING  
 SAMSUNG'S MOTION TO COMPEL  
 APPLE TO PRODUCE RECIPROCAL  
 EXPEDITED DISCOVERY**

24 Defendants.

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**[PROPOSED] ORDER**

Before the Court is Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC’s (collectively “Samsung”) Motion to Compel Apple to Produce Reciprocal Expedited Discovery (the “Motion”).

Having considered Samsung’s Motion, the declarations cited therein, and all pleadings and other papers in support thereof; and the Opposition filed by Apple Inc. (“Apple”), all declarations cited therein, and all pleadings and other papers in support thereof; and any further argument or evidence presented by the parties; the Court concludes that good cause exists for Samsung’s Motion. The Court therefore ORDERS that Apple shall produce the following by June 17, 2011:

- (1) The latest iteration of a product sample of the next generation iPhone that Apple will release, whether that product will be known as the “iPhone 4S,” “iPhone 5,” or some other name;
- (2) The latest iteration of a product sample of the next generation iPad that Apple will release, whether that product will be known as the “iPad 3,” “Third Generation iPad,” or some other name;
- (3) The latest iteration of the packaging in which the next generation iPhone and iPad will be sold; and
- (4) The latest iteration of the package insert(s) for the next generation iPhone and iPad.

This discovery shall be produced with the designation “Outside Counsel Eyes Only” and shall not be provided to Samsung or its in-house counsel.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2011

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LUCY H. KOH  
United States District Judge