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11 Attorneys for Plaintiff and  
 Counterclaim-Defendant APPLE INC.

14 UNITED STATES DISTRICT COURT  
 15 NORTHERN DISTRICT OF CALIFORNIA  
 16 SAN JOSE DIVISION

17 APPLE INC.,  
 18 Plaintiff,  
 19 v.  
 20 SAMSUNG ELECTRONICS CO., LTD., A  
 Korean business entity; SAMSUNG  
 21 ELECTRONICS AMERICA, INC., a New York  
 corporation; SAMSUNG  
 22 TELECOMMUNICATIONS AMERICA, LLC, a  
 Delaware limited liability company.,  
 23 Defendants.  
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Case No. 11-cv-01846-LHK (PSG)  
**STIPULATION AND [PROPOSED]  
 ORDER SHORTENING TIME ON  
 SCHEDULE FOR BRIEFING AND  
 HEARING DISCOVERY  
 MOTIONS**

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1 Pursuant to Civil L.R. 6-2, Apple and Samsung file this Stipulation requesting that  
2 discovery motions they each plan to file this week are heard on shortened time. This request is  
3 supported by the attached Declaration of Mia Mazza in Support of Stipulation to Shorten Time on  
4 Schedule for Briefing and Hearing Discovery Motions.

5 WHEREAS, on January 5, 2012, the parties held a lead trial meet-and-confer session in an  
6 attempt to resolve several discovery disputes that have arisen between the parties, but after  
7 lengthy discussion, some disputes between the parties remain unresolved;

8 WHEREAS, both parties wish to file discovery motions that will be heard as quickly as  
9 possible, to ensure that any resulting Order may allow for timely relief in light of upcoming  
10 depositions and the March 8, 2012, fact discovery cutoff;

11 WHEREAS, under the proposed expedited schedule, the parties are prepared to waive  
12 their respective rights to submit reply memoranda in support of their motions; and

13 WHEREAS, the proposed expedited schedule would not postpone any of the other  
14 deadlines set in this case; rather, it would merely provide an avenue for the parties to obtain  
15 expedited relief;

16 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the  
17 parties that:

- 18 1. Each party's opening briefs shall be filed by Tuesday, January 10, 2012;
- 19 2. Each party's opposition briefs shall be filed by 8 a.m. on Tuesday, January 17, 2012;

20 and

21 3. The hearing on both parties' motions shall take place on January 18, 2012 at 2:00 P.M.,  
22 or such other time thereafter as the Court may calendar.

23 **IT IS SO STIPULATED.**

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Dated: January 9, 2012

JASON R. BARTLETT  
MORRISON & FOERSTER LLP

By: /s/ Jason R. Bartlett  
JASON R. BARTLETT  
Attorneys for Apple

Dated: January 9, 2012

RACHEL HERRICK KASSABIAN  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By: /s/ Rachel Herrick Kassabian  
RACHEL HERRICK KASSABIAN  
Attorneys for Samsung

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**ORDER**

Pursuant to Stipulation, and GOOD CAUSE HAVING BEEN SHOWN, **IT IS SO ORDERED.**

Dated:

By: \_\_\_\_\_  
Honorable Paul S. Grewal, U.S.M.J.