

1 HAROLD J. MCELHINNY (CA SBN 66781)  
 hmcclhinny@mofo.com  
 2 MICHAEL A. JACOBS (CA SBN 111664)  
 mjacobs@mofo.com  
 3 JENNIFER LEE TAYLOR (CA SBN 161368)  
 jtaylor@mofo.com  
 4 ALISON M. TUCHER (CA SBN 171363)  
 atucher@mofo.com  
 5 RICHARD S.J. HUNG (CA SBN 197425)  
 rhung@mofo.com  
 6 JASON R. BARTLETT (CA SBN 214530)  
 jasonbartlett@mofo.com  
 7 MORRISON & FOERSTER LLP  
 425 Market Street  
 8 San Francisco, California 94105-2482  
 Telephone: (415) 268-7000  
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE  
 william.lee@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 60 State Street  
 Boston, MA 02109  
 Telephone: (617) 526-6000  
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)  
 mark.selwyn@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 950 Page Mill Road  
 Palo Alto, California 94304  
 Telephone: (650) 858-6000  
 Facsimile: (650) 858-6100

11 Attorneys for Plaintiff and  
 12 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.  
 24

Case No. 11-cv-01846-LHK (PSG)  
**DECLARATION OF MIA MAZZA  
 IN SUPPORT OF STIPULATION  
 SHORTENING TIME ON  
 SCHEDULE FOR BRIEFING AND  
 HEARING DISCOVERY  
 MOTIONS**

25  
 26  
 27  
 28

1 I, Mia Mazza, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP, counsel for Apple.  
3 I am licensed to practice law in the State of California. Unless otherwise indicated, I have  
4 personal knowledge of the matters stated herein and, if called as a witness, could and would  
5 testify competently thereto. I make this declaration in support of the parties' Stipulation to  
6 Shorten Time on Schedule for Briefing and Hearing Discovery Motions.

7 2. On January 5, 2012, the parties held a lead trial meet and confer session in an  
8 attempt to resolve several discovery disputes that have arisen between the parties. The meeting  
9 lasted three and a half hours and some progress was made during that meeting. Many of the  
10 disputes between the parties, however, have not been resolved.

11 3. The fact discovery cutoff in this case is March 8, 2012. Both parties have noticed  
12 a large number of depositions anticipated to take place in January and February, 2012.

13 4. In light of the upcoming depositions and fact discovery cutoff, both parties wish to  
14 file discovery motions that will be heard as quickly as possible, to ensure that any resulting Order  
15 may allow for timely relief.

16 5. The Court has granted several motions filed by both parties to shorten time on  
17 discovery motions. Most recently, Apple filed a motion to compel on December 8, 2011, and  
18 Samsung filed a motion to compel on December 12, 2011. In both cases, the moving party  
19 sought and was granted the requested Order shortening time.

20 6. The requested time modification would not affect the overall schedule for the case.  
21 In fact, the parties' request for shortening of time has arisen in large part because the discovery  
22 cutoff is less than two months away.

23 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
24 9th day of January, 2012 at San Francisco, California.

25 /s/ Mia Mazza  
26 Mia Mazza

27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION OF E-FILED SIGNATURE**

I, Jason R. Bartlett, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Mia Mazza has concurred in this filing.

Dated: January 9, 2012

/s/ Jason R. Bartlett  
Jason R. Bartlett