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 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,

CASE NO. 11-cv-01846-LHK

19 Plaintiff,

**DECLARATION OF BRETT ARNOLD IN
 SUPPORT OF THE STIPULATION TO
 ENLARGE TIME FOR SAMSUNG TO
 FILE OBJECTIONS TO THE COURT'S
 DECEMBER 22, 2011 ORDER (DKT NO.
 535)**

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

1 I, Brett Arnold, declare:

2 1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
4 Telecommunications America, LLC (collectively, "Samsung") in this action. Unless otherwise
5 indicated, I have personal knowledge of the facts set forth in this declaration and, if called upon as
6 a witness, I could and would testify as follows.

7 2. The relief requested in the parties' Stipulation and Proposed Order to Enlarge Time
8 for Samsung to File Objections to the Court's December 22, 2011 Order at Docket No. 535 is
9 intended to avoid burdening the Court with duplicative motion practice while this Court resolves
10 Samsung's outstanding motion for clarification regarding its December 22 Order.

11 3. Pursuant to the stipulation entered by the Court at Docket No. 571, Samsung has
12 until today, January 17, 2012 to file with the district judge a motion for relief from the Court's
13 December 22 order at Docket No. 535.

14 4. On January 11, 2012, Samsung filed a motion for clarification regarding the
15 Court's Order at Docket No. 535. (That motion for clarification was submitted under seal at Dkt
16 No. 602 and in proposed redacted form at Dkt No. 606.) The motion will be heard by the Court
17 this Thursday at 10:00 a.m. (See Dkt No. 629.)

18 5. It will help conserve the resources of the Court, as well as those of the parties, to
19 extend Samsung's deadline to file objections to the December 22, 2011 Order until 7 days after
20 this Court issues an order on Samsung's motion for clarification.

21 6. Pursuant to L.R. 6-3(a)(5), previous time modifications in the case, whether by
22 stipulation or Court order, include the following:

23 A. On April 26, 2011, the Court granted Apple's motion to shorten time for
24 briefing and hearing on its motion to expedite discovery. (Dkt No. 26.)

25 B. On May 9, 2011, Apple and Samsung stipulated and agreed that the time for
26 Samsung to serve responsive pleadings pursuant to Rule 12(a) shall be 75
27 days after April 21, 2011. On May 10, 2011, the Court signed the

1 Stipulation and Order regarding an extension of time for Samsung to serve
2 responsive pleadings. (Dkt No. 40.)

3 C. On June 1, 2011, the Court granted in part Samsung's request to shorten
4 time for hearing and briefing on Samsung's Motion to Compel Reciprocal
5 Expedited Discovery. (Dkt No. 59.)

6 D. On July 18, 2011 the Court ordered a briefing schedule related to expedited
7 discovery and Apple's motion for a preliminary injunction, setting dates
8 from July 2011 through the October 13, 2011 hearing on Apple's Motion
9 for Preliminary Injunction. (Dkt No. 115.)

10 E. On July 21, 2011, the Court granted the parties' stipulation to extend the
11 time for briefing Samsung's Motion to Disqualify Counsel Bridges &
12 Mavrakakis, LLP. (Dkt No. 125.)

13 F. On September 1, 2011 the Court granted Samsung's stipulated motion to
14 expedite briefing on Samsung's Motion to Compel Apple to Produce
15 Documents and Things. (Dkt No. 199)

16 G. On September 6, 2011 the Court granted Apple's stipulated motion to
17 extend time for Apple to respond to Samsung's Motion to Exclude the
18 Ordinary Observer Opinions of Apple Expert Cooper Woodring. (Dkt No.
19 210.)

20 H. On September 20, 2011, the Court granted Samsung's unopposed motion to
21 change the hearing date on its motion to dismiss. (Dkt No. 244.)

22 I. On September 23, 2011, the Court granted Apple's motion to shorten time
23 to expedite briefing on Apple's motion to compel. (Dkt No. 255.)

24 J. On October 3, 2011, the Court granted-in-part Samsung's motion to shorten
25 the briefing and hearing schedule on Samsung's motion to compel. (Dkt
26 No. 287.)

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- K. On October 27, 2011, the Court granted Apple’s motion to shorten time for the briefing and hearing schedule for its motion for a protective order. (Dkt No. 332.)
- L. On October 31, 2011, the Court granted Samsung’s motion to shorten the briefing and hearing schedule on Samsung’s motion to compel. (Dkt No. 350.)
- M. On December 9, 2011, the Court granted Apple’s motion to shorten time for briefing and hearing on Apple’s motion to compel. (Dkt No. 477.)
- N. On December 13, 2011, the Court granted Samsung’s motion to shorten time for briefing and hearing on Samsung’s motion to compel. (Dkt. No. 499).
- O. On December 22, 2011, the Court granted Apple’s motion to shorten time for briefing and hearing on Apple’s motion to strike. (Dkt. No. 538).
- P. On December 30, 2011, the Court granted Samsung’s motion to shorten time for briefing on Samsung’s motion to extend time. (Dkt No. 566.)
- Q. On January 4, 2012, the Court granted the parties’ stipulated request to enlarge the time for Samsung to file objections to the Court’s Order at docket number 535. (Dkt No. 571.)
- R. On January 11, 2012, the Court granted the parties’ stipulated request to shorten the time for briefing and hearing the parties’ discovery motions. (Dkt No. 610.)

7. The present request will not affect any other deadlines in this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood Shores, California on January 17, 2012.

/s/ Brett Arnold

