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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

12 APPLE INC., a California corporation,

CASE NO. 11-cv-01846-LHK-PSG

13 Plaintiff,

14 vs.

**[PROPOSED] ORDER DENYING
APPLE'S MOTION FOR PROTECTIVE
ORDER REGARDING SAMSUNG'S
FIRST RULE 30(b)(6) DEPOSITION
NOTICE**15 SAMSUNG ELECTRONICS CO., LTD., a
16 Korean business entity; SAMSUNG
17 ELECTRONICS AMERICA, INC., a New
18 York corporation; SAMSUNG
19 TELECOMMUNICATIONS AMERICA,
20 LLC, a Delaware limited liability company,21 Defendants.
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1 On January 10, 2012, Plaintiff Apple Inc. ("Apple") moved for a protective order relieving
2 it of any obligation to respond to or comply with Samsung's First 30(b)(6) Deposition Notice,
3 served to Apple on December 14, 2011. Samsung Electronics Co., Ltd. ("Samsung") has
4 opposed the motion.

5 Having considered the briefs and the arguments of the parties, the Court finds that Apple
6 has not shown good cause for the entry of a protective order, and hereby DENIES Apple's motion
7 for a protective order in its entirety. Apple shall identify its Rule 30(b)(6) designee(s) for the
8 topics listed in Samsung's Notice within five calendar days of the date of this Order, and shall
9 make the witness(es) available for deposition on mutually agreeable dates on or before March 1,
10 2012.

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12 **IT IS SO ORDERED.**

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14 DATED: _____, 2012

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The Honorable Paul S. Grewal
United States Magistrate Judge
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