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 CO., LTD., SAMSUNG ELECTRONICS
 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,

19 Plaintiff,

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

CASE NO. 11-cv-01846-LHK

**SAMSUNG' MOTION TO SHORTEN
 TIME FOR BRIEFING AND HEARING
 ON ITS MOTION TO SUPPLEMENT
 INVALIDITY CONTENTIONS**

1 Pursuant to Civil L.R. 6-3, Defendants Samsung Electronics Co. Ltd., Samsung Electronics
2 America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung")
3 hereby bring this motion to shorten time for briefing and hearing on Samsung's Motion to
4 Supplement Its Invalidity Contentions. Specifically, Samsung requests that:

- 5 1. Apple's Opposition to the Motion to Supplement Its Invalidity Contentions be filed
6 on or before Wednesday, February 1, 2012;
- 7 2. Samsung's Reply be filed on or before Monday, February 6, 2012;
- 8 3. Hearing before Judge Koh occur on Thursday, February 16, 2012 at 1:30 p.m., or
9 such other time thereafter as the Court may calendar.

10 Shortened time is necessary because Samsung is seeking to supplement its invalidity
11 contentions to include five additional prior art references related to five of Apple's eight patents
12 prior to the March 8, 2012 close of fact discovery. Samsung's motion seeks to include 5
13 important prior art references that challenge the validity of Apple's patents. As described in
14 detail in its motion, Samsung has diligently investigated and pursued these prior art references,
15 and Apple is not prejudiced because it had prior notice of these references.

16 If Samsung's Motion to Supplement Its Invalidity Contentions were decided according to
17 the schedule set forth in Local Rule 7-2 and 7-3, Apple's opposition would not be due until
18 February 9, 2012; Samsung's reply would not be due until February 16, 2012, and a hearing would
19 be scheduled no sooner than May 2012 (based on the Court's comments at the conclusion of the
20 Markman Hearing).

21 Counsel for Samsung Contacted Apple on January 26, 2012 and requested that it stipulate
22 to a shortened briefing schedule on its Motion to Supplement Its Infringement Contentions.
23 Apple did not respond to this request.

24 **CONCLUSION**

25 Samsung has shown good cause why the Court should grant this Motion. For the
26 foregoing reasons, Samsung respectfully requests that the Court grant Samsung's Motion to
27 Shorten Time For Briefing and Hearing On Samsung's Motion to Supplement Its Invalidity
28 Contentions.

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DATED: January 26, 2012

QUINN EMANUEL URQUHART &
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By /s/ Victoria F. Maroulis
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