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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New York
corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company,

Defendants.

Case No. 11-cv-01846-LHK (PSG)

**[PROPOSED] ORDER GRANTING
APPLE’S MOTION TO COMPEL
TIMELY PRODUCTION OF
FOREIGN-LANGUAGE AND
OTHER DOCUMENTS IN
ADVANCE OF RELATED
DEPOSITIONS**

1 Plaintiff Apple Inc. (“Apple”) has moved for an order compelling defendants Samsung
2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC (“Samsung”) to produce relevant, responsive documents from the files of each
4 witness noticed for deposition at least ten (10) days in advance of his or her deposition if they
5 contain foreign-language materials. Apple further moved the Court for an order compelling
6 Samsung to produce other relevant, responsive English-language documents from the files of
7 each witness noticed for deposition at least five (5) days in advance of the witness’s deposition.

8 Having considered the arguments of the parties and the papers submitted, and good cause
9 having been shown, the Court hereby GRANTS Apple’s Motion to Compel Timely Production of
10 Foreign-Language and Other Documents in Advance of Related Depositions. Samsung is hereby
11 ORDERED: (1) to produce relevant, responsive documents from the files of each witness noticed
12 for deposition at least ten (10) days in advance of his or her deposition if they are written in whole
13 or in part in a foreign language; and (2) to produce other relevant, responsive documents from the
14 files of each witness noticed for deposition at least five (5) days in advance of the witness’s
15 deposition.

16 **IT IS SO ORDERED.**

17 Dated: February _____, 2012.

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20 HONORABLE PAUL S. GREWAL
21 United States Magistrate Judge
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