1 2 3 4 5 6 7 8	QUINN EMANUEL URQUHART & SULLIV Charles K. Verhoeven (Bar No. 170151) charlesverhoeven@quinnemanuel.com 50 California Street, 22 <sup>nd</sup> Floor San Francisco, California 94111 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Kevin P.B. Johnson (Bar No. 177129 kevinjohnson@quinnemanuel.com Victoria F. Maroulis (Bar No. 202603) victoriamaroulis@quinnemanuel.com 555 Twin Dolphin Drive, 5 <sup>th</sup> Floor Redwood Shores, California 94065-2139 Telephone: (650) 801-5000 Facsimile: (650) 801-5100	AN, LLP
12 13	Michael T. Zeller (Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (213) 443-3100 Attorneys for SAMSUNG ELECTRONICS CC LTD., SAMSUNG ELECTRONICS AMERICA INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC	А,
13 16 17 18	UNITED STATE	S DISTRICT COURT ALIFORNIA, SAN JOSE DIVISION
19 20 21 22 23 24 25 26 27 28 02198.51855/4581565.1	APPLE INC., a California corporation, Plaintiff, vs. 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, Defendant. AMENDED N	CASE NO. 11-cv-01846-LHK <b>AMENDED NOTICE OF MOTION TO</b> <b>PERMIT SAMSUNG'S EXPERT SAMUEL</b> <b>LUCENTE TO REVIEW MATERIALS</b> <b>DESIGNATED UNDER THE</b> <b>PROTECTIVE ORDER</b> Date: March 6, 2012 Time: 10:00 a.m. Place: Courtroom 5, 4th Floor Judge: Hon. Paul S. Grewal
		L LUCENTE TO REVIEW CONFIDENTIAL MATERIALS Dockets.Justia.com

1	AMENDED NOTICE OF MOTION	
2	TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:	
3	PLEASE TAKE NOTICE that on March 6, 2012 at 10:00 a.m. or as soon as the matter	
4	may be heard by the Honorable Paul S. Grewal in Courtroom 5, United States District Court for	
5		
	the Northern District of California, Robert F. Peckham Federal Building, 280 South 1st Street, San	
6	Jose, CA 95113, , Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.,	
7	and Samsung Telecommunications America, LLC (collectively "Samsung") shall and hereby do	
8	move the Court for an order granting Samsung's Motion To Permit Samsung's Expert Samuel	
9	Lucente To Review Materials Designated Under The Protective Order. This motion is based on	
10	this amended notice of motion; the notice of motion and supporting memorandum of points and	
11	authorities filed on January 30, 2012; the supporting declaration of Albert Bedecarré; and such	
12	other written or oral argument as may be presented at or before the time this motion is taken under	
13	submission by the Court.	
14	RELIEF REQUESTED	
15	Samsung seeks an order allowing Samuel Lucente to view documents, transcripts and other	
16	discovery that have been designated or are subsequently designated by Apple under any operative	
17	protective order in this litigation.	
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19	DATED: February 01, 2012 Respectfully submitted,	
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	QUINN EMANUEL URQUHART & SULLIVAN, LLP	
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23	By/s/ Michael Zeller Charles K. Verhoeven	
24	Kevin P.B. Johnson	
25	Victoria F. Maroulis Michael T. Zeller	
26	Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA,	
27	INC. and SAMSUNG	
28	TELECOMMUNICATIONS AMERICA, LLC	
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	AMENDED NOTICE OF MOTION TO PERMIT SAMSUNG'S EXPERT SAMUEL LUCENTE TO REVIEW CONFIDENTIAL MATERIALS	

1	General Order 45 Attestation	
2	I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to e-file	
3	this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Michael Zeller	
4	has concurred in this filing.	
5	/s/ Victoria Maroulis	
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02198.51855/4581565.1	-2- AMENDED NOTICE OF MOTION TO PERMIT SAMSUNG'S EXPERT	
	AMENDED NOTICE OF MOTION TO PERMIT SAMSUNG'S EXPERT SAMUEL LUCENTE TO REVIEW CONFIDENTIAL MATERIALS	