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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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,

Defendants.

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

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE DEADLINE
FOR SAMSUNG TO FILE
DECLARATION SUPPORTING APPLE'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

Plaintiff Apple Inc. ("Apple") and Defendants Samsung Electronics Co. Ltd.,
Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC
(collectively, "Samsung"), stipulate as follows:

On January 25, 2012, Apple filed an Administrative Motion to File Documents
Under Seal (Dkt. No. 660), regarding confidential portions of Apple's Notice of Motion and
Motion for Partial Summary Judgment ("Apple's Motion for Partial Summary Judgment"), as well
as Exhibits 24 and 46 – 48 to the Declaration of Joseph J. Mueller in support thereof ("Mueller

1 Declaration”). These documents contain information that Samsung has designated as
2 confidential under the interim protective order.

3 Pursuant to Civil Local Rule 79-5(d), Samsung was required to file, by February 1,
4 2012, a declaration and accompanying Proposed Order showing good cause to permit the sealing
5 of Apple’s Motion for Partial Summary Judgment and Exhibits 24 and 46 – 48 to the Mueller
6 Declaration.

7 The parties agree that the deadline for filing a declaration and Proposed Order shall
8 be extended to permit Samsung to file the declaration and Proposed Order concurrently with this
9 stipulation.

10
11 So Stipulated:

12
13 Dated: February 3, 2012

Dated: February 3, 2012

14 WILMER CUTLER PICKERING HALE
15 AND DORR LLP

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

16
17
18 By: _____
19 /s/ Peter J. Kolovos
20 WILLIAM F. LEE
21 MARK D. SELWYN
22 PETER J. KOLOVOS

By: _____
/s/ Victoria F. Maroulis
CHARLES K. VERHOEVEN
KEVIN P.B. JOHNSON
VICTORIA F. MAROULIS
EDWARD DEFRANCO
MICHAEL T. ZELLER

Attorneys for APPLE INC.

Attorneys for SAMSUNG ELECTRONICS
CO. LTD, SAMSUNG ELECTRONICS
AMERICA, INC., AND SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC.

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IT IS SO ORDERED.

DATED: February _____, 2012

Hon. Lucy H. Koh
United States District Judge