

Exhibit A

From: Bartlett, Jason R. [JasonBartlett@mofocom]
Sent: Wednesday, November 09, 2011 10:02 PM
To: Samsung v. Apple
Cc: peter.kolovos@wilmerhale.com; mark.selwyn@wilmerhale.com; Victoria Maroulis; Melissa Chan; Overson, Wesley E.; Jacobs, Michael A.; Hung, Richard S. J.; Beyer, Tom E.; Ahn, Deok Keun Matthew; Taylor, Jennifer Lee (SF); Mazza, Mia; sam.maselli@wilmerhale.com; Mazza, Mia; AppleMoFo; Monach, Andrew E.
Subject: Apple v. Samsung, Case No. 11-CV-01846: Proposed Stipulation
Attachments: Stipulation_and_Proposed_Order_re_Adding_Accused_Products.DOC

Counsel,

Please review the attached draft stipulation and let us know by tomorrow whether Samsung will agree to it.
Sincerely,

Jason R. Bartlett
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Direct: 415.268.6615

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10
11 Attorneys for Plaintiff and
12 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15
16 SAN JOSE DIVISION

17
18 APPLE INC.,

19 Plaintiff,

20 v.

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. 4:11-cv-01846-LHK

**STIPULATION AND
[PROPOSED] ORDER
REGARDING ADDING
ACCUSED PRODUCTS**

1 Apple Inc. (“Apple”) and Samsung Electronics Co. LTD (“SEC”), Samsung Electronics
2 America, Inc. (“SEA”), and Samsung Telecommunications America, LLC (“STA”) (collectively,
3 “Samsung”), through their respective counsel, stipulate as follows:

4 Apple may add as Accused Products in this action, without adding patents-in-suit or
5 asserting infringement of any claims of the patents-in suit that were not asserted in Apple’s initial
6 Infringement Contentions under Local Rule 3-1, the following Samsung Products:

7 Galaxy Tab 8.9

8 Galaxy Tab 7.0 (including the 7.0 Plus)

9 Galaxy Player 4.0

10 Galaxy Player 5.0

11 Galaxy S II Skyrocket

12 Amended Supplemental Infringement Contentions under Local Rule 3-1 for these
13 additional Accused Products shall be served within seven days of the Court’s entry of an Order
14 implementing this Stipulation. Samsung shall comply with Local Rule 3-4(a) with respect to
15 these additional Accused Products within fourteen days of Apple’s service of its Supplemental
16 Infringement Contentions.

17 Supplemental Invalidity Contentions or additional proposed terms for construction may be
18 permitted only for good cause based on a showing that the grounds for the Supplemental
19 Infringement Contentions are materially different than those asserted in Apple’s initial
20 Infringement Contentions.

1 The service of Supplemental Infringement Contentions shall not affect the total number of
2 claim terms to be construed and shall not change any of the other dates or discovery limitations
3 set forth in the Court's previous Orders.

4 So Stipulated:

5 Dated: November ____, 2011

Dated November ____, 2011

6 MORRISON & FOERSTER LLP

7 QUINN EMANUEL URQUHART &
8 SULLIVAN, LLP

9 By: _____
10 HAROLD J. MCELHINNY
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CO. LTD, SAMSUNG ELECTRONICS
AMERICA, INC., AND SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC.

18 **IT IS SO ORDERED.**

19
20 Dated: _____, 2011

By: _____

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22 Honorable Lucy H. Koh
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