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

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN JOSE DIVISION

17 APPLE INC., a California corporation,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 21 AMERICA, INC., a New York corporation; and
 SAMSUNG TELECOMMUNICATIONS
 22 AMERICA, LLC, a Delaware limited liability
 company,
 23 Defendants.
 24

Case No. 11-cv-01846-LHK

**APPLE'S RE-NOTICED MOTION TO
 COMPEL TIMELY PRODUCTION
 OF FOREIGN-LANGUAGE AND
 OTHER DOCUMENTS IN ADVANCE
 OF RELATED DEPOSITIONS**

Date: March 6, 2012
 Time: 10:00 a.m.
 Place: Courtroom 5, 4th Floor
 Judge: Hon. Paul S. Grewal

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NOTICE OF MOTION AND MOTION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 6, 2012, at 10:00 a.m., or as soon thereafter as the matter may be heard by the Honorable Paul S. Grewal in Courtroom 5, United States District Court for the Northern District of California, Robert F. Peckham Federal Building, 280 South 1st Street, San Jose, CA 95113, Apple, Inc. (“Apple”) shall and hereby does move the Court for an Order compelling defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC (“Samsung”) to produce relevant, responsive documents from the files of each witness noticed for deposition at least ten (10) days in advance of his or her deposition, if the documents are written in whole or in part in a foreign language. Apple further moves the Court for an Order compelling Samsung to produce other relevant, responsive English-language documents from the files of each witness noticed for deposition at least five (5) days in advance of the witness’s deposition.

This re-noticed motion is based on this notice of motion, the supporting memorandum of points and authorities filed and served by Apple on January 27, 2012 (Dkt. No. 682), the Declaration of Mia Mazza submitted and served by Apple on January 27, 2012 and exhibits attached thereto (Dkt. No. 683), and such other written or oral argument as may be presented at or before the time this motion is taken under submission by the Court.

RELIEF REQUESTED

Pursuant to Federal Rules of Civil Procedure 26 and 37, Apple requests an Order compelling Samsung to produce relevant, responsive documents from the files of each witness noticed for deposition at least ten (10) days in advance of the witness’s deposition if they are written in whole or in part in a foreign language. Apple further requests that Samsung be compelled to produce other relevant, responsive English-language documents from each witness’s files at least five (5) days in advance of the witness’s deposition.

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Dated: February 11, 2012

MORRISON & FOERSTER LLP

By: /s/ Michael A. Jacobs
Michael A. Jacobs

Attorneys for Plaintiff
APPLE INC.