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## UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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APPLE INC., a California corporation,

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

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Plaintiff,

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vs.

**[PROPOSED] ORDER GRANTING  
SAMSUNG'S MOTION FOR  
PROTECTIVE ORDER PRECLUDING  
THE DEPOSITIONS OF TEN HIGH-  
RANKING EXECUTIVES**

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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,

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Defendants.

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The motion of Samsung Electronics Co. Ltd. ("SEC"), Samsung Electronics America, Inc. ("SEA"), and Samsung Telecommunications America, LLC ("STA") (collectively, "Samsung") came on regularly for hearing on March 27, 2012 at 10:00 a.m. in Courtroom 5 of the above-entitled Court, the Honorable Paul S. Grewal presiding. All parties were given notice of the hearing.

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Having considered all papers filed herein and the oral argument of counsel, and good cause appearing: IT IS HEREBY ORDERED that Samsung's Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Executives is GRANTED. Apple Inc.'s notices of deposition for the following individuals are hereby quashed in their entirety:

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1. Gee Sung Choi, Chief Executive Officer and Vice Chairman of SEC;
2. Jong Kyu Shin, President of Mobile Communications for SEC;
3. Won-Pyo Hong, Executive Vice President of Mobile Communications for SEC;
4. Heonbae Kim, Executive Vice President of Advanced Software Research and Development for SEC;
5. Seunghwan Cho, Executive Vice President of Advanced Software Research and Development Team 2 for SEC;
6. Dong Jin Koh, Executive Vice President Technology Strategy Team for SEC;
7. Seungho Ahn, Executive Vice President and Head of SEC's Intellectual Property Center;
8. Jaewan Chi, Executive Vice President of SEC's Intellectual Property Center;
9. Dale Sohn, President and Chief Executive Officer of STA; and
10. Joseph Cheong, Chief Financial Officer of STA.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2012

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HONORABLE PAUL S. GREWAL  
United States Magistrate Judge