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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC.,

Plaintiff,

v.

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 RE BRIEFING
SCHEDULE FOR APPLE'S APEX
MOTION AND APPLE'S MOTION
FOR ASSOCIATED FEES**

1 Pursuant to Civil L.R. 6-2, Apple and Samsung file this Stipulation requesting that the
2 Court revise the briefing schedule for Samsung's oppositions and Apple's reply briefs in support of
3 Apple's Apex Motion and Fees Motion.

4 WHEREAS, on February 16, 2012, Apple filed and served a Motion to Compel
5 Depositions of 14 of Samsung's Purported "Apex" Witnesses ("Apex Motion") (Docket No. 736);

6 WHEREAS, on February 16, 2012, Apple filed and served a Motion for Attorneys' Fees
7 and Costs in Connection with Motion to Compel Depositions of 14 of Samsung's Purported
8 "Apex" Witnesses ("Associated Fees Motion") (Docket No. 741);

9 WHEREAS, the parties require additional time to prepare their briefing on these motions
10 and to explore potential opportunities for the resolution or narrowing of these motions before
11 briefing is completed; and

12 WHEREAS, the proposed expedited schedule would not postpone any of the other
13 deadlines set in this case;

14 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the
15 parties that Samsung's opposition briefs to Apple's Apex Motion (Docket Nos. 736/746) and
16 Associated Fees Motion (Docket No. 741) shall be filed on Monday, March 5, 2012, and Apple's
17 reply briefs in support of Apple's Apex Motion and Fees Motion shall be filed on Thursday, March
18 15, 2012.

19
20 **IT IS SO STIPULATED.**

21 Dated: February 29, 2012

MORRISON & FOERSTER LLP

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24 By: /s/ Richard S.J. Hung
Richard S.J. Hung

25 Attorneys for Plaintiff
26 APPLE INC.

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Dated: February 29, 2012

RACHEL HERRICK KASSABIAN
QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Rachel Herrick Kassabian
RACHEL HERRICK KASSABIAN
Attorneys for Samsung

*** **

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

By: _____
Honorable Paul S. Grewal
United States Magistrate Judge

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ATTESTATION OF E-FILED SIGNATURE

I, Rachel Herrick Kassabian, am the ECF User whose ID and password are being used to file this Stipulation. In compliance with General Order 45, X.B., I hereby attest that Richard S.J. Hung has concurred in this filing.

Dated: February 29, 2011

/s/ Rachel Herrick Kassabian
Rachel Herrick Kassabian