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11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN JOSE DIVISION

16 APPLE INC., a California corporation,

17 Plaintiff,

18 v.

19 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
20 ELECTRONICS AMERICA, INC., a New York
corporation; SAMSUNG
21 TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company,

22 Defendants.

Case No. 11-cv-01846-LHK

**ADMINISTRATIVE REQUEST FOR
LEAVE TO FILE SUPPLEMENTAL
MAZZA DECLARATION IN SUPPORT
OF APPLE'S 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

25 Pursuant to Civil Local Rules 7-3(d) and 7-11, Apple Inc. ("Apple") hereby requests leave
26 of Court to file the Supplemental Declaration of Mia Mazza ("Supplemental Mazza
27 Declaration"). Copies of the Supplemental Mazza Declaration and Exhibit A-1 that Apple seeks
28 to file are appended to this administrative request.

1 On February 24, 2012, Apple filed its Reply in Support of its Motion to Compel Timely
2 Production of Foreign-Language and Other Documents in Advance of Related Depositions. (Dkt.
3 No. 756.) The February 24 Reply included the Declaration of Mia Mazza in Support of Apple's
4 Reply in Support of its Motion to Compel ("Mazza Reply Declaration"). (Dkt. No. 756-1.)
5 Exhibit A to the Mazza Reply Declaration was a chart reflecting the following information for
6 various Samsung deponents: (1) the deposition date; (2) the deposition time; (3) the production
7 date of documents relating to Samsung's deponent; (4) the production time of those documents;
8 (5) the hours differential between the production time and the deposition time; (6) the number of
9 documents produced; and (7) number of pages produced. (Dkt. No. 756-2.)

10 Since the filing of the Mazza Reply Declaration, the depositions of several more Samsung
11 witnesses have taken place or are scheduled for the next several days. Samsung's pattern of tardy
12 production of foreign-language and other documents in advance of related depositions has
13 continued, including the production of significant volumes less than three days in advance. An
14 updated version of the chart described above may aid the Court's consideration of the issues
15 involved in Apple's Motion to Compel Timely Production of Foreign-Language and Other
16 Documents in Advance of Related Depositions.

17 Accordingly, Apple respectfully requests permission to file the accompanying
18 Supplemental Mazza Declaration.

19
20 Dated: March 4, 2012

MORRISON & FOERSTER LLP

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22 By: /s/ Richard S.J. Hung
23 RICHARD S.J. HUNG
24 Attorneys for Plaintiff
25 APPLE INC.
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