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14 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
15 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
16

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
19

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
Korean business entity; SAMSUNG
24 ELECTRONICS AMERICA, INC., a New
York corporation; SAMSUNG
25 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

26 Defendant.
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CASE NO. 11-cv-01846-LHK (PSG)

**ADMINISTRATIVE REQUEST FOR
LEAVE TO FILE SUR-REPLY IN
SUPPORT OF SAMSUNG'S OPPOSITION
TO APPLE'S MOTION TO COMPEL**

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

1 Pursuant to Civil Local Rules 7-3(d) and 7-11, Samsung Electronics Co., Ltd., Samsung
2 Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively,
3 “Samsung”) hereby request leave of Court to file a Sur-Reply In Support of Samsung's Opposition
4 to Apple's Motion to Compel. On February 23, 2011, Apple filed a Reply In Support of Its
5 Motion to Compel Timely Production of Foreign-Language and Other Documents. (Dkt. No. 735)
6 This Reply sought, for the first time, to reopen the depositions of dozens of Samsung witnesses.
7 Unless this Court grants Samsung leave to file a sur-reply, Samsung will not have the opportunity
8 to brief the Court on Apple's new request for relief before the hearing on March 6, 2012.

9 Furthermore, on March 4, 2012, Apple filed a supplemental declaration which, along with
10 its Reply, creates an incomplete and misleading depiction of the parties’ productions to date, and
11 therefore the propriety of the relief Apple seeks. (Dkt. No. 766.) The Court should grant
12 Samsung the opportunity to address this new evidence, which was raised for the first time in
13 Apple's Reply and supplemental materials.

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16 DATED: March 6, 2012

Respectfully submitted,

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18 QUINN EMANUEL URQUHART & SULLIVAN, LLP

19 By: /s/ Victoria Maroulis

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