

1 Counsel Information Appears on the Following Page

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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,

Defendant.

Case No. 11-cv-01846-LHK (PSG)

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE
FOR BRIEFING APEX-RELATED
MOTION TO COMPEL AND
MOTION FOR PROTECTIVE
ORDER**

1 Pursuant to Civil L.R. 6-2, Apple and Samsung file this Stipulation requesting that the
2 Court revise the briefing schedule for Apple's Apex Motion and Samsung's related Protective
3 Order 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
6 No. 736);

7 WHEREAS, on February 23, 2012, Samsung filed and served a Motion for Protective
8 Order ("Protective Order Motion") relating to the Apex Motion (Docket No. 754-2);

9 WHEREAS, Apple's opposition to the Protective Order Motion and its reply in support of
10 the Apex Motion are currently due on March 8 and March 15, 2012, respectively, and Samsung's
11 reply in support of the Protective Order Motion is currently due on March 15, 2012;

12 WHEREAS, the parties agree that Apple's opposition and reply briefs should be
13 combined into a single brief to reduce the total number of briefs filed with the Court on apex-
14 related issues; and

15 WHEREAS, the proposed adjusted schedule would not postpone any of the other
16 deadlines set in this case;

17 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the
18 parties that:

19 1. Apple's opposition to Samsung's Protective Order Motion, and Apple's reply in
20 support of its Apex Motion, shall be filed as a single brief, not to exceed 25 pages, no later than
21 March 12, 2012.

22 2. Samsung's reply in support of its Protective Order Motion shall be filed on
23 March 19, 2012.

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IT IS SO STIPULATED.

Dated: March 8, 2012

MORRISON & FOERSTER LLP

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

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Attorneys for Plaintiff
APPLE INC.

Dated: March 8, 2012

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

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ORDER

Based on the foregoing stipulation,

IT IS SO ORDERED.

Dated:

HONORABLE PAUL S. GREWAL
United States Magistrate Judge

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, 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 Rachel Herrick Kassabian has concurred in this filing.

Dated: March 8, 2012

/s/ Michael A. Jacobs
Michael A. Jacobs