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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 SAMSUNG'S
SUBPOENA TO THIRD PARTY
WALMART**

1 Pursuant to Civil L.R. 6-2, Apple Inc. ("Apple") and Samsung Electronics Corporation,
2 Ltd., Samsung Telecommunications America, LLC., and Samsung Electronics America, Inc.,
3 (collectively, "Samsung") file this Stipulation requesting that the Court extend the March 8, 2012
4 fact discovery cutoff with respect to Wal-Mart Stores Inc.

5 WHEREAS, on February 3, 2012, Samsung Electronics Co. Ltd. ("Samsung") served a
6 subpoena on Wal-Mart Stores Inc. ("Wal-Mart") requesting that Wal-Mart produce documents and
7 sit for a deposition in *Apple v. Samsung Elecs. Co. et al.*, Case No. 11-cv-1846 LHK (N.D. Cal.);

8 WHEREAS, Wal-Mart has requested an extension to respond to the subpoena, whereby
9 Wal-Mart will provide discovery after the March 8, 2012 discovery cut-off; and

10 WHEREAS, Apple Inc. ("Apple") and Samsung Electronics Co. Ltd. do not oppose
11 granting Wal-Mart this extension;

12 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the
13 parties that Wal-Mart shall have until April 6, 2012 to comply with Samsung's subpoena. IT IS
14 FURTHER HEREBY STIPULATED and agreed to by and between the parties that the extension
15 of time granted to Wal-Mart shall have no effect on the case schedule otherwise.

16
17 **IT IS SO STIPULATED.**

18 Dated: March 8, 2012

MORRISON & FOERSTER LLP

19
20 By: /s/ Philip Besirof
21 Philip Besirof

22 Attorneys for APPLE INC.

23 Dated: March 8, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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25 By: /s/ Scott Kidman
26 Scott Kidman

27 Attorneys for SAMSUNG
28 ELECTRONICS CO., LTD et al.

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

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

1 **General Order 45 Attestation**

2 I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to e-file
3 this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Scott Kidman
4 has concurred in this filing.

4 /s/ Victoria Maroulis

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