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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

APPLE INC., a California corporation,

Plaintiff,

vs.

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

Defendants.

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

Counterclaim-Plaintiffs,

v.

APPLE INC., a California corporation,

Counterclaim-Defendant.

Civil Action No. 11-CV-01846-LHK

**[PROPOSED] ORDER GRANTING  
APPLE'S MOTION TO COMPEL**

Date: April 24, 2012

Time: 10:00 a.m.

1 Plaintiff Apple Inc. (“Apple”) has moved pursuant to Federal Rule of Civil Procedure 37  
2 for an order compelling Defendants Samsung Electronics Co., Ltd, Samsung Electronics  
3 America, Inc., and Samsung Telecommunications America, LLC (collectively, “Samsung”) to  
4 complete its production of certain identified documents and things. Having considered the  
5 arguments of the parties and the papers submitted, and GOOD CAUSE HAVING BEEN  
6 SHOWN, the Court hereby GRANTS Apple’s Motion to Compel as follows:  
7

8 IT IS ORDERED that Samsung shall make a complete production of the documents  
9 identified in subsections A – B below.

- 10 A. Documents, expert reports, deposition transcripts and other filings not publicly  
11 available to Apple from other Samsung litigations in which Samsung took any  
12 position regarding the licensing of patents and other intellectual property rights  
13 (“IPR”) claimed to be essential to the UMTS standard, the determination of a fair,  
14 reasonable and non-discriminatory (“FRAND”) royalty, and the propriety of  
15 injunctive relief for the infringement of IPR claimed to be essential to the UMTS  
16 standard;
- 17 B. Documents concerning Samsung’s plans and strategies for developing, marketing  
18 or licensing of IPR that is claimed to be essential to the UMTS standard including  
19 presentations to executive management and the Board of Directors  
20

21 **IT IS SO ORDERED.**

22  
23 Dated:

By: \_\_\_\_\_

Honorable Paul S. Grewal, U.S.M.J.