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*Attorneys for Plaintiff and
 Counterclaim-Defendant Apple Inc.*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

15 APPLE INC., a California corporation,
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 Plaintiff,
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 v.
 18 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 19 AMERICA, INC., a New York corporation; and
 SAMSUNG TELECOMMUNICATIONS
 20 AMERICA, LLC, a Delaware limited liability
 company,
 21
 Defendants.

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

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER
 EXTENDING THE DEADLINE
 TO FILE A REPLY IN SUPPORT
 OF APPLE'S MOTION TO
 COMPEL**

1 WHEREAS, on March 15, 2012, Apple Inc. (“Apple”) filed a Motion to Compel Samsung
2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
3 America, LLC (collectively “Samsung,” and together with Apple, “the Parties” and individually
4 each a “Party”) to produce (i) documents relating to positions Samsung has taken in other
5 litigations regarding the licensing of patents and other intellectual property rights (“IPR”) claimed
6 to be essential to the UMTS standard, the determination of a fair, reasonable and non-
7 discriminatory (“FRAND”) royalty, and the propriety of injunctive relief for the infringement of
8 IPR claimed to be essential to the UMTS standard; and (ii) documents concerning Samsung’s
9 plans for the development, marketing or licensing of IPR that is claimed to be essential to the
10 UMTS standard.

11 WHEREAS, on March 29, 2012, Samsung filed an Opposition to Apple’s Motion to
12 Compel;

13 WHEREAS, pursuant to Civ. L.R. 7-3(c), the reply in support of Apple’s Motion to
14 Compel is currently due to be filed on or before April 5, 2012;

15 WHEREAS, on March 28, 2012, Samsung made a proposal to Apple in an effort to
16 resolve the matters raised in Apple’s Motion to Compel, to which Apple responded on that same
17 date;

18 WHEREAS, since March 28, 2012, the Parties have continued to exchange proposals in
19 an effort to resolve the matters raised in Apple’s motion, including exchanging language for a
20 proposed joint stipulation to resolve these issues on March 30, April 3, and April 4, 2012;

21 WHEREAS, the Parties are continuing to meet and confer regarding a joint stipulation to
22 resolve this discovery dispute without the Court’s intervention, but require additional time to
23 continue their negotiations to see whether a resolution can be reached;

24 WHEREAS, the new deadline jointly proposed by the Parties (April 10, 2012) for Apple
25 to file its reply in support of Apple’s Motion to Compel would still allow the Court thirteen (13)
26 days before the April 24, 2012 hearing in which to consider all papers on the Motion;

27 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as
28 follows:

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1. The filing date for the reply in support of Apple’s Motion to Compel will be extended to and including April 10, 2012;
2. No other dates or deadlines shall be modified by this stipulation and order; and
3. This extension of time is without prejudice to either Apple or Samsung, and shall not be construed or otherwise used in any way to support a contention of delay, untimeliness, or lack of harm to Apple or Samsung arising from the acts alleged in this action or this motion.

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Dated: April 5, 2012

Dated: April 5, 2012

/s/ Mark D. Selwyn
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*Counsel for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Telecommunications America, LLC*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:



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ATTESTATION OF E-FILED SIGNATURE

I, Mark D. Selwyn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Victoria Maroulis has concurred in this filing.

Dated: April 5, 2012

/s/ Mark. D Selwyn
Mark D. Selwyn