

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 425 Market Street
 8 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 9 Facsimile: (415) 268-7522

KENNETH H. BRIDGES (CA SBN 243541)
 kbridges@bridgesmav.com
 MICHAEL T. PIEJA (CA SBN 250351)
 mpieja@bridgesmav.com
 BRIDGES & MAVRAKAKIS LLP
 3000 El Camino Real
 One Palo Alto Square, 2nd Floor
 Palo Alto, CA 94306
 Telephone: (650) 804-7800
 Facsimile: (650) 852-9224

10 Attorneys for Plaintiff
 APPLE INC.

11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

15 APPLE INC., a California corporation,
 16 Plaintiff,
 17 v.
 18 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 19 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 20 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 21 Defendants.
 22

Case No. 11-cv-01846-LHK
**[PROPOSED] PRELIMINARY
 INJUNCTION**
 Date: August 25, 2011
 Time: 1:30 p.m.
 Place: Courtroom 4, 5th Floor
 Judge: Hon. Lucy H. Koh

23
 24
 25
 26
 27
 28

1 Before the Court is Plaintiff Apple Inc.'s Motion for a Preliminary Injunction. In
2 consideration of the entire record, Apple has demonstrated that it is likely to succeed on the
3 merits of its design and utility patent infringement allegations against Defendants Samsung
4 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications
5 America, Inc. (collectively "Samsung"); that it suffers irreparable harm from Samsung's ongoing
6 infringement, which results in the erosion of Apple's market share, and good will; and that the
7 balance of equities and public interest favor the protection of Apple, whose intellectual property
8 was targeted by Samsung in its efforts to gain market share in the mobile device market.

9 Accordingly, IT IS HEREBY ORDERED:

10 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
11 Telecommunications America, Inc., its officers, directors, partners, agents, servants, employees,
12 attorneys, subsidiaries, and those acting in concert with any of them, are enjoined from making,
13 using, offering to sell, or selling within the United States, or importing into the United States,
14 Samsung's Galaxy S 4G and Infuse 4G phones and Galaxy Tab 10.1 tablet computer, which are
15 depicted in Apple's moving papers, and any product that is no more than colorably different from
16 these specified products and embodies any design contained in U.S. Design Patent No. D618,677,
17 D593,087, or D504,889.

18 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
19 Telecommunications America, Inc., its officers, directors, partners, agents, servants, employees,
20 attorneys, subsidiaries, and those acting in concert with any of them, are enjoined from making,
21 using, offering to sell, or selling within the United States, or importing into the United States
22 Samsung's Galaxy S 4G, Infuse 4G, and Droid Charge phones and Galaxy Tab 10.1 tablet
23 computer, and any product that is no more than colorably different from these specified products
24 and infringes U.S. Patent No. 7,469,381.

25 Dated: _____, 2011

26 _____
27 HONORABLE LUCY H. KOH
28 UNITED STATES DISTRICT JUDGE