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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 corporation; SAMSUNG
ELECTRONICS AMERICA, INC., a New
York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

Defendants.

Case No. 11-cv-01846-LHK

**STIPULATED AMENDMENT TO THE
PROTECTIVE ORDER REGARDING
INTEL CODE PRODUCTION**

Plaintiff Apple Inc. (“Apple”) and Defendants and counterclaim-plaintiffs Samsung Electronics Co. Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America LLC (collectively “Samsung”) (collectively referred to herein as the “Parties”) have sought production of documents, testimony or information reflecting confidential and proprietary information from non-party Intel Corporation (“Intel”). The Court adopted a Protective Order proposed by Samsung in its Order of January 27, 2012 (the “Protective Order”). Intel has requested protections for its confidential information that are not provided in the Protective Order, and the Parties have agreed to provide these protections, as reflected in this Stipulated

1 Amendment to the Protective Order Regarding Intel Code Production (“Amendment to the
2 Protective Order”):

3 1. As a further restriction under Section 6(b) of the Protective Order, the scope of the
4 prosecution bar extends to “the subject matter of the patents-in-suit or wireless modem hardware
5 and protocol software for implementation of physical or data link layers in devices for mobile
6 telephony” for anyone who receives one or more items designated as “INTEL CONFIDENTIAL
7 – ATTORNEYS’ EYES ONLY” or “INTEL CONFIDENTIAL – OUTSIDE ATTORNEYS’
8 EYES ONLY – SOURCE CODE.”

9 2. As a further restriction under Section 11(j) of the Protective Order, Intel shall, upon
10 request, deliver three (3) sets of printed documents to each office of the outside counsel of the
11 Receiving Party identified by the Receiving Party. The Receiving Party may not make any
12 additional paper copies of any portions of the Source Code received from Intel, not including
13 copies attached to court filings or used at depositions.

14 3. As a further restriction under Section 11(k) of the Protective Order, printed source code
15 identified as “INTEL CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE
16 CODE” must be kept at all times at an office of the Receiving Party’s Outside Counsel.

17 4. As an additional restriction under Section 12(d) of the Protective Order, prior to
18 receiving any material marked as “INTEL CONFIDENTIAL – ATTORNEYS’ EYES ONLY” or
19 “INTEL CONFIDENTIAL – OUTSIDE ATTORNEYS’ EYES ONLY – SOURCE CODE,” the
20 Person must execute a copy of the “Agreement to Be Bound by Protective Orders” (Exhibit B
21 hereto) and serve it on all Parties and Intel.
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27 **STIPULATED AND AGREED:**
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March 26

Dated: ~~February~~ _____, 2012

Respectfully submitted,

William F. Lee
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Mark D. Selwyn
WILMER CUTLER PICKERING
HALE AND DORR LLP
950 Page Mill Road
Palo Alto, California 94304
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

Harold J. McElhinny
Michael A. Jacobs
Richard S.J. Hung
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, California 94105
Telephone: (415) 268-7000
Facsimile: (415) 268-7522

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

Victor Marchi 

Charles K. Verhoeven
QUINN EMANUEL URQUHART
& SULLIVAN LLP
50 California Street, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875-6600

Victoria Maroulis
QUINN EMANUEL URQUHART
& SULLIVAN LLP
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
Telephone: (650) 801-5066

Diane C. Hutnyan
QUINN EMANUEL URQUHART
& SULLIVAN LLP
865 S. Figueroa St., 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000

*Counsel for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Telecommunications America, LLC*

IT IS SO ORDERED.

Date: _____

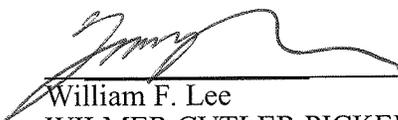
UNITED STATES MAGISTRATE JUDGE

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March 25

Dated: ~~February~~ _____, 2012

Respectfully submitted,



William F. Lee
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
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& SULLIVAN LLP
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*Counsel for Plaintiff and Counterclaim-
Defendant Apple Inc.*

*Counsel for Samsung Electronics Co., Ltd.,
Samsung Electronics America, Inc., and
Samsung Telecommunications America, LLC*

IT IS SO ORDERED.

Date: _____

UNITED STATES MAGISTRATE JUDGE

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EXHIBIT B

Agreement to Be Bound by Protective Orders

I, _____, acknowledge and declare that I have received a copy of the Protective Order and the Amendment to the Protective Order Regarding Intel Code Production (“Orders”) in *Apple, Inc. v. Samsung Electronics Co., Ltd. et al.*, U.S. District Court for the Northern District of California Civil Action No 11-cv-01846-LHK. Having read and understood the terms of both Orders, I agree to be bound by the terms of the Orders and consent to the jurisdiction of the District Court for the purpose of any proceeding to enforce the terms of the Orders.

Name of individual: _____

Present occupation/job description: _____

Name of Company or Firm: _____

Address: _____

Dated: _____

[Signature]