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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

IN RE:

QUALCOMM LITIGATION,

Case No. 3:17-CV-00108-GPC-MDD

[Consolidated with 3:17-CV-01010-GPC-MDD]

ORDER GRANTING MOTIONS TO SEAL

[ECF Nos.: 887, 890, 894, 897, 900, 903, 906, 909, 912, 915, 916, 920, 924, 925, 930, 934, 935, 940, 944, 947, 950, 951, 956, 957, 962, 964, 968, 969, 972, 976, 991, 995, 1000, 1004, 1007, 1011, 1012, 1016, 1021, 1033, 1049, 1052, 1056, 1059.]

1 Before the Court are numerous requests to seal portions of the parties' replies and
2 responses to *motions in limine*, *Daubert* motions, expert witness reports in support of
3 those briefings, and other pre-trial motions with respect to authenticity and foundation
4 objections as well as trial order and evidence presentation in Case No. 3:17-cv-00108-
5 GPC-MDD, ECF Nos. 887, 890, 894, 897, 900, 903, 906, 909, 912, 915, 916, 920, 924,
6 925, 930, 934, 935, 940, 944, 947, 950, 951, 956, 957, 962, 964, 968, 969, 972, 976, 991,
7 995, 1000, 1004, 1007, 1011, 1012, 1016, 1021, 1033, 1049, 1052, 1056, 1059. No
8 oppositions have been filed. Upon review of the moving papers, the information to be
9 sealed, the applicable law, and for the following reasons, the Court **GRANTS** each of the
10 motions in their entirety.

11 LEGAL STANDARD

12 There is a presumptive right of public access to court records based upon the
13 common law and the first amendment. *See Nixon v. Warner Commc'ns, Inc.*, 435 U.S.
14 589, 597 (1978); *Phillips ex rel. Estates of Byrd v. General Motors Corp.*, 307 F.3d 1206,
15 1212-13 (9th Cir. 2002). Nonetheless, access may be denied to protect sensitive
16 confidential information. Courts are more likely to protect information covered by Rule
17 26(c) of the Federal Rules of Civil Procedure, but are not limited by items listed in
18 protective orders. *See KL Group v. Case, Kay, & Lynch*, 829 F.2d 909, 917-19 (9th Cir.
19 1987) (letter to client from attorney); *Kalinauskas v. Wong*, 151 F.R.D. 363, 365-67
20 (D. Nev. 1993) (confidential settlement agreement).

21 “Unless a particular court record is one traditionally kept secret, a strong
22 presumption in favor of access is the starting point.” *Kamakana v. City & Cty. of*
23 *Honolulu*, 447 F.3d 1172, 1178-80 (9th Cir. 2006) (citing *Foltz v. State Farm Mut. Auto.*
24 *Ins. Co.*, 331 F.3d 1122, 1135 (9th Cir. 2003)). “In order to overcome this strong
25 presumption, a party seeking to seal a judicial record must articulate justifications for
26 sealing that outweigh the historical right of access and the public policies favoring
27 disclosure.” *Id.* at 1178-79.

1 The presumption of access is “based on the need for federal courts, although
2 independent—indeed, particularly because they are independent—to have a measure of
3 accountability and for the public to have confidence in the administration of justice.”
4 *United States v. Amodeo* (Amodeo II), 71 F.3d 1044, 1048 (2d Cir.1995); *see also Valley*
5 *Broad. Co. v. U.S. Dist. Court—D. Nev.*, 798 F.2d 1289, 1294 (9th Cir.1986) (explaining
6 that the presumption of public access “promot[es] the public's understanding of the
7 judicial process and of significant public events”).

8 Accordingly, “[a] party seeking to seal a judicial record then bears the burden of
9 overcoming this strong presumption by meeting the ‘compelling reasons’ standard.”
10 *Kamakana*, 447 F.3d at 1178. Under this stringent standard, a court may seal records only
11 when it finds “a compelling reason and articulate[s] the factual basis for its ruling,
12 without relying on hypothesis or conjecture.” *Id.* at 1179. The court must then
13 “conscientiously balance[] the competing interests of the public and the party who seeks
14 to keep certain judicial records secret.” *Id.* (quoting *Foltz*, 331 F.3d at 1135) (alteration in
15 original) (internal quotation marks omitted). What constitutes a “compelling reason” is
16 “best left to the sound discretion of the trial court.” *Nixon*, 435 U.S. at 599.

17 Previously, some courts applied a “compelling reason” or “good cause” standard
18 for sealing depending on whether the pending motion was dispositive or non-dispositive.
19 *E.g.*, *Kamakana*, 447 F.3d at 1180 (9th Cir. 2006) (parties seeking to seal documents in a
20 dispositive motion must provide “compelling reasons” to support a sealing whereas for
21 non-dispositive motions the parties must show a lesser “particularized showing” under
22 the “good cause” standard pursuant to Federal Rule of Civil Procedure 26(c)); *Phillips ex*
23 *rel. Estates of Byrd v. Gen. Motors Corp.*, 307 F.3d 1206, 1213 (9th Cir. 2002) (when a
24 party attaches a sealed discovery document to a nondispositive motion, the usual
25 presumption of the public's right of access is rebutted).

26 Other courts rejected this binary approach. *In re Midland National Life Insurance*
27 *Company Annuity Sales Practices Litigation*, 686 F.3d 1115 (9th Cir.2012), is one such
28 case that rejected the literal dispositive/nondispositive label. In that case, an intervenor

1 moved to unseal documents attached to a *Daubert* motion. *Id.* at 1118. The district court,
2 like the district court here, concluded that the documents should remain under seal
3 because “the *Daubert* motion was non-dispositive,” as it “would not have been a
4 determination on the merits of any claim or defense.” *Id.* at 1119. The Ninth Circuit
5 rejected the district court's focus on whether the motion was literally “dispositive”: “That
6 the records are connected to a *Daubert* motion does not, on its own, conclusively resolve
7 the issue.” *Id.* As the motion, in effect, “pertain[ed] to central issues bearing on
8 defendant's summary judgment motion,” we treated that motion as dispositive. *Id.*
9 Similarly, the court in *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1100
10 (9th Cir. 2016) observed that it would not allow the technically nondispositive nature of a
11 *Daubert* motion to cloud the reality that it was able to significantly affect the disposition
12 of the issues in the case.

13 Here, the motions to seal relate to numerous evidentiary and pre-trial motions.
14 This Court will apply the “compelling reasons” standard to these motions and related
15 briefing as those submissions pertain to central issues at trial and are “more than
16 tangentially related to the underlying cause of action.” *Ctrs. for Auto Safety v. Chrysler*
17 *Grp.*, 809 F.3d 1092, 1099 (9th Cir. 2016).

18 Compelling reasons for sealing information exist “when such ‘court files might
19 have become a vehicle for improper purposes,’ such as the use of records to gratify
20 private spite, promote public scandal, circulate libelous statements, or release trade
21 secrets.” *Kamakana*, 447 F.3d at 1179 (quoting *Nixon*, 435 U.S. at 598). Trade secrets
22 “may consist of any formula, pattern, device or compilation of information which is used
23 in one’s business, and which gives him an opportunity to obtain advantage over
24 competitions who do not know or use it.” Restatement (First) of Torts § 757 cmt. b.
25 Because trade secrets concern proprietary and sensitive business information not
26 available to the public, sealing may be warranted where disclosure would harm a
27 litigant’s competitive standing. *Nixon*, 425 U.S. at 598.

1 The Ninth Circuit has explicitly recognized that compelling reasons exist for the
2 sealing of “pricing terms, royalty rates, and guaranteed minimum payment terms” of
3 license agreements. *See In re Elec. Arts, Inc.*, 298 F. App’x 568, 569 (9th Cir. 2008).
4 Courts in this circuit have also recognized that information subject to confidentiality
5 agreements may also meet the “compelling reasons” standard when accompanied by a
6 particularized factual showing. *See Foltz*, 331 F.3d at 1137-38.

7 DISCUSSION

8 The overwhelming majority of information that the parties seek to seal constitutes
9 confidential business information of the parties, including trade secrets, proprietary
10 business records, discussions of internal strategy, company dealings, and materials
11 designated as “Highly Confidential.” For the reasons that follow, the Court concludes
12 that the parties have demonstrated that compelling reasons exist for sealing the
13 information subsumed by these categories.

14 First, the Court is convinced that good cause exists to seal the unredacted portions
15 of these motions and the requisite exhibits that detail sensitive financial terms, royalty
16 agreements, proprietary business strategies, and confidential licensing negotiations. Each
17 of the parties has articulated that public disclosure of the information they seek to seal
18 would harm their competitive standing by concurrently releasing such information to
19 market competitors. Additionally, the parties have submitted declarations for each of
20 these motions and provided the Court with a factual basis for their claims of undue
21 prejudice through competitive harm. Furthermore, the parties’ proposed sealings hew to
22 the lines that the Court has drawn in prior orders granting the parties’ motions to file
23 under seal, especially with respect to documents and testimony designated as Highly
24 Confidential. *See* ECF Nos. 580, 561, 768. As such, the Court is satisfied that there is
25 sufficient factual basis to justify the conclusion that compelling reasons exist for sealing
26 the material at issue.

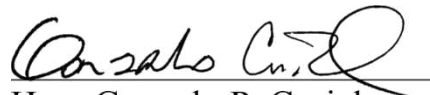
27 Second, each of the parties has narrowly tailored its requests to the protectable
28 portions of the filings that advance confidential business information. The majority of

1 the redacted materials are comprised of limited excerpts of exhibits and sentences of the
2 full reports that implicate the parties' confidential, non-public business practices and
3 information. Moreover, the basis for these respective motions do not rest on the
4 disclosure of the more detailed, specific, and confidential information that the parties
5 seek to protect. The primary issues within these reports are stated publicly in the motion
6 papers and accompanying unredacted exhibits.

7 Accordingly, the Court finds that the requests to seal are narrowly tailored and
8 sufficiently particularized such that they do not impede upon the public's ability to
9 understand the nature of the proceedings and the factual basis for the parties' claims. As
10 such and in the light of the aforementioned compelling reasons justifying sealing, the
11 Court **GRANTS** each of the motions to seal or file redacted versions identified by the
12 **following table** in its entirety.

13 **IT IS SO ORDERED.**

14 Dated: April 9, 2019


15 Hon. Gonzalo P. Curiel
16 United States District Judge
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<u>ECF No.</u>	<u>Movant</u>	<u>Document to be Sealed</u>
3:17-cv-00108-GPC-MDD		
887	Qualcomm	Unredacted Memorandum of Points and Authorities in Opposition to Apple's Motion <i>in Limine</i> No. 6 to Exclude Evidence of Apple's Indemnification of the CMs ("Memorandum") and Exhibits 1-14 to the March 1, 2019 Declaration of Anders Linderot in Support of Qualcomm's Opposition to Apple's Motion <i>in Limine</i> No. 6 to Exclude Evidence of Apple's Indemnification of the CMs ("Linderot Declaration Exhibits")
890	Qualcomm	Exhibits 1 and 2 to the Declaration of James W. Carlson in Support of Qualcomm's Opposition to the Apple and the Contract Manufacturers' Motion <i>in Limine</i> No. 11 (the "Carlson Declaration").
894	Qualcomm	Unredacted Opposition to Apple Inc. and the Contract Manufacturers' Motion <i>in Limine</i> No. 9 ("Motion <i>in Limine</i> No. 9"), Exhibit 1 to the March 1, 2019 Declaration of Nathan E. Denning in Support of Qualcomm's Opposition to Motion <i>in Limine</i> No. 9 ("Denning Decl. Exhibit")
897	Qualcomm	Portions of its Opposition to Apple Inc. and the Contract Manufacturers' (collectively, "Apple") Motion <i>in Limine</i> No. 7 ("Opposition to Motion <i>in Limine</i> No. 7"), Exhibits 1 to 3, 6 and 7 to the March 1, 2019 Declaration of Nathan E. Denning in Support of Qualcomm's Opposition to Motion <i>in Limine</i> No. 7 ("Denning Decl. Exhibits")
900	Qualcomm	Unredacted Opposition to Apple and the Contract Manufacturers' (collectively "Apple") Motion <i>in Limine</i> No. 12 ("Motion <i>in Limine</i> No. 12"), an

1			Unredacted March 1, 2019 Declaration of James W. Carlson in Support of Qualcomm’s
2			Opposition to Motion <i>in Limine</i> No. 12
3			(“Carlson Declaration”), and Exhibits 2 to 7 to
4			the Carlson Declaration (“Carlson Decl. Exhibits”)
5	903	Qualcomm	Unredacted Opposition to Apple Inc.’s Motion <i>in</i>
6			<i>Limine</i> No. 8, Exhibits
7			1 to 3 to the March 1, 2019 Declaration of
8			Nathan E. Denning in Support of Qualcomm’s
9			Opposition to Motion <i>in Limine</i> No. 8 (“Denning
10			Decl. Exhibits”)
11	906	Qualcomm	Unredacted Opposition to the Contract
12			Manufacturers’ Motion <i>in</i>
13			<i>Limine</i> No. 15 (“Opposition to the CMs’ Motion
14			<i>in Limine</i> No. 15”), Exhibits 1 to 7 to
15			the March 1, 2019 Declaration of Nathan E.
16			Denning in Support of Qualcomm’s
17			Opposition to the CMs’ Motion <i>in Limine</i> No. 15
18			(“Denning Decl. Exhibits”)
19	909	Qualcomm	Unredacted Opposition to Apple Inc. and the
20			Contract Manufacturers’
21			Motion <i>in Limine</i> No. 1, Exhibits 5-6 and 10-12
22			to the March 1, 2019 Declaration of
23			Nathan E. Denning in Support of Qualcomm’s
24			Opposition to Apple Inc. and the Contract
25			Manufacturers’ Motion <i>in Limine</i> No. 1
26			(“Denning Decl. Exhibits”)
27	912	Qualcomm	Unredacted Opposition to Apple Inc.’s Motion <i>in</i>
28			<i>Limine</i> No. 4
			(“Opposition to Motion <i>in Limine</i> No. 4”),
			Exhibits 1, 4-5, and 11-15 to the March 1,
			2019 Declaration of James W. Carlson in
			Support of Qualcomm’s Opposition to Motion
			<i>in Limine</i> No. 4 (“Carlson Decl. Exhibits”)
	915	Qualcomm	Unredacted Opposition to Apple’s and the CMs’
			<i>Daubert</i> Motion Re:
			243 Patents (ECF 804) (“Opposition to <i>Daubert</i>
			Motion Re: 243 Patents”), Exhibits 9 –
			11 to the March 1, 2019 Declaration of Nathan
			E. Denning in Support of Qualcomm’s

1			Opposition to <i>Daubert</i> Motion Re: 243 Patents (“Denning Decl. Exhibits”)
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3	916	Apple	Portions of Apple Inc. and the Contract Manufacturers’ Opposition to Qualcomm’s <i>Daubert</i> Motion No. 6 to Exclude
4			Certain Testimony of Rémy Libchaber and
5			Stephen Wicker, and Exhibit 2 to the
6			Declaration of Aamir Kazi in Support Thereof
7	920	Apple	Portions of Apple Inc. and
8			the Contract Manufacturers’ Opposition to
9			Qualcomm Incorporated’s Motion <i>In</i>
10			<i>Limine</i> No. 3 To Exclude Hearsay Evidence
11	924	Apple	From Unretained Experts
12			Portions of Apple and the Contract
13			Manufacturers’ Opposition to Qualcomm
14			Incorporated’s <i>Daubert</i> Motion No. 5
15			and Motion <i>in Limine</i> To Exclude Testimony
16			Suggesting a Required Component-
17			Level Royalty Base (“Opposition”), and certain
18			exhibits to the Appendix of
19			Exhibits in support of Apple and the Contract
20			Manufacturers’ Opposition
21			(“Appendix of Exhibits”)
22	925	Qualcomm	Exhibits 4-5, 7-8 and 10 to the February 15,
23			2019 Declaration of Anders
24			Linderot in Support of Qualcomm’s Opposition
25			to Apple and the CMs’ Motion <i>in Limine</i>
26			No. 13 (“Linderot Decl. Exhibits”)
27	930	Qualcomm	Exhibits 1, 2, 5, 7 and 8 to the March 1, 2019
28			Declaration of Nathan E.
			Denning in Support of Qualcomm’s Opposition
			to Apple Inc. and the Contract
			Manufacturers’ Motion <i>in Limine</i> No. 2
			(“Denning Decl. Exhibits”)
	934	Qualcomm	Unredacted Opposition to Apple’s and the CMs’
			<i>Daubert</i> Motion Re:
			Apportionment and EMVR (“Apportionment
			<i>Daubert</i> Opposition”) and Exhibits 1 - 15
			to the March 1, 2019 Declaration of Nathan E.
			Denning in Support of the Apportionment

1			<i>Daubert</i> Opposition (“Denning Decl. Exhibits”)
2	935	Apple	Portions of Apple Inc. and the
3			CMs’ Opposition to Qualcomm’s <i>Daubert</i>
4			Motion No. 4 To Exclude Expert
5			Testimony Regarding Exhaustion and
			“Substantial Embodiment” (Apple and the
			CMs’ Opposition to <i>Daubert</i> No. 4)
6	940	Qualcomm	Unredacted Opposition to Apple’s and the CMs’
7			<i>Daubert</i> Motion Re:
8			Certain Nevo Opinions (the “Opposition to
9			<i>Daubert</i> Re: Nevo Opinions”), Exhibits 2-4
10			and 6 to the March 1, 2019 Declaration of
			Nathan E. Denning in Support of the
			Opposition to <i>Daubert</i> Re: Nevo Opinions
			(“Denning Decl. Exhibits”)
11	944	Qualcomm	Unredacted Opposition to Apple Inc. and the
12			CMs’ <i>Daubert</i> Re: Certain
13			Huber, Putnam, and Stasik Opinions
14			(“Qualcomm’s “Unwilling Licensee”
15			Opposition”),
16			Exhibits 2 to 4 and 6 to 9 to the March 1, 2019
			Declaration of Nathan E. Denning in
			Support of Qualcomm’s “Unwilling Licensee”
			Opposition (“Denning Decl. Exhibits”)
17	947	CMs	Opposition to Qualcomm’s <i>Daubert</i>
18			Motion No. 3 to Exclude the Testimony of Dr.
			Jeffrey Leitzinger
19	950	Apple	Portions of Apple Inc. and the Contract
20			Manufacturers’ Opposition to Qualcomm’s
21			<i>Daubert</i> Motion No. 2 to Exclude
22			Portions of the Expert Report of Paul K. Meyer
23			and to Forbid Improper
24			Extrapolation of Dr. Valenti’s Opinions, and
			Exhibits 2–6 and 8–9 to the
			Declaration of Benjamin C. Elacqua in support
			thereof
25	951	Apple	Portions of Apple and the Contract
26			Manufacturers’ (“CMs”) Opposition to
27			Qualcomm Incorporated’s Motion <i>in</i>
28			<i>Limine</i> No. 7 to Exclude the Opinions and
			Testimony of Friedhelm Rodermund

		("Opposition"), and portions of an exhibit to the Appendix of Exhibits in support of Apple's Opposition
956	Qualcomm	Unredacted Opposition to Apple Inc.'s Motion <i>In Limine</i> No. 5, Exhibits 3-6 and 7-11 to the March 1, 2019 Declaration of Nathan E. Denning in Support of Qualcomm's Opposition to Apple's Motion <i>In Limine</i> No. 5 ("Denning Decl. Exhibits")
957	Apple	Portions of Apple and the Contract Manufacturers' Opposition to Qualcomm Incorporated's Motion <i>in Limine</i> No. 2 To Exclude Evidence of Qualcomm's Public Relations Strategy ("Opposition"), and certain exhibits to the Appendix of Exhibits in support of Apple and the Contract Manufacturers' Opposition
962	Qualcomm	Exhibits 7 and 8 to the March 1, 2019 Declaration of Nathan E. Denning in Support of Qualcomm's Opposition to Apple Inc. and the Contract Manufacturers' <i>Daubert</i> Motion No. 3 ("Denning Decl. Exhibits")
964	Qualcomm	Portions of its Opposition to Apple Inc. and the Contract Manufacturers' <i>Daubert</i> Motion to Exclude Qualcomm Expert Oliver Hart ("Brief") and the entirety of Exhibit A thereto ("Exhibit A").
968	Qualcomm	Portions of its Opposition to Apple Inc. and the Contract Manufacturers' <i>Daubert</i> Motion to Exclude Certain Opinions of Qualcomm Expert Jonathan Putnam ("Brief"), as well as the entirety of Exhibits 1-3, 9, and 11-12 thereto
969	Apple	Portions of Apple Inc. ("Apple") and the Contract Manufacturers' Opposition to Qualcomm Inc.'s Motion <i>in Limine</i> No. 1 to Exclude Evidence and Argument Concerning Royalty Stacking, and Exhibits 1-2 to the Declaration of Aleksandr Gelberg

1	972	Apple	Portions of Apple and the Contract
2			Manufacturers' ("CMs") Opposition to
3			Qualcomm Incorporated's
4			("Qualcomm's") <i>Daubert</i> Motion No. 1 To
5			Exclude Inadmissible Comparable
6			License Analysis ("Opposition"), the Declaration
7			of Shira Liu in Support of the
8	976	Qualcomm	Portions of its Opposition to Apple
9			Inc. and the Contract Manufacturers' Motion in
10			<i>Limine</i> No. 3 to exclude evidence or
11			argument that Apple and the CMs make, use,
12			offer to sell, sell, or import Qualcomm's
13			patented technology ("Brief")
14	991	Apple	Portions of Apple Inc. and the Contract
15			Manufacturers' Reply in Support of Their
16			<i>Daubert</i> Motion To Exclude Qualcomm
17			Expert Oliver Hart
18	995	Qualcomm	Unredacted Reply in Further Support of Its
19			<i>Daubert</i> Motion No. 1 to
20			Exclude Inadmissible Comparable License
21			Analyses ("Reply")
22	1000	Qualcomm	Portions of its unredacted Reply in Further
23			Support of its <i>Daubert</i> Motion
24			No. 5 and Motion <i>in Limine</i> to Exclude
25			Testimony Suggesting a Required Component-
26			Level Royalty Base ("Reply in Further Support
27			of <i>Daubert</i> Motion No. 5"), Exhibit 1 to
28			the March 8, 2019 Declaration of Nathan E.
			Denning in Support of Qualcomm's <i>Daubert</i>
			Motion No. 5 ("Denning Decl. Exhibit")
	1004	Qualcomm	Unredacted Reply in Further Support of
			Qualcomm's <i>Daubert</i> Motion
			No. 4 To Exclude Expert Testimony Regarding
			Exhaustion and "Substantial
			Embodiment" (Valenti, Wicker, Akl, Bims,
			Lanning, Stark, Stevenson, Wells, Libchaber,
			Meyer and Simcoe) ("Reply ISO <i>Daubert</i>
			Motion No. 4"), Exhibits 29, 30 and 32 – 36 to

		the March 8, 2019 Declaration of Nathan E. Denning in Support of Qualcomm’s Reply ISO <i>Daubert</i> Motion No. 4 (“Denning Decl. Exhibits”)
1007	Qualcomm	Unredacted Reply in Further Support of its <i>Daubert</i> Motion No. 3 to Exclude the Opinions and Testimony of Dr. Jeffrey Leitzinger Concerning Royalty “Overcharges” (“Reply”)
1011	Apple	Portions of Apple and the CMs’ Opposition to Qualcomm Incorporated’s Motion for Determination of French Law Pursuant to Fed. R. Civ. P. 44.1 (“Opposition”), and Exhibits D, F-I, L-N, P, TY, DD, FF-HH to the Declaration of Benjamin C. Elacqua in support thereof
1012	Apple	Portions of Apple and the Contract Manufacturers’ (“CMs”) Reply in Support of Their <i>Daubert</i> Motion To Exclude Regression Analysis by Qualcomm Expert Professor Aviv Nevo (“Reply”)
1016	Qualcomm	Unredacted Reply in Further Support of its <i>Daubert</i> Motion No. 2 to Exclude Portions of the Expert Report of Paul K. Meyer and to Forbid Improper Extrapolation of Dr. Valenti’s Opinions (“Reply”) and Exhibits 26 and 29 to the March 8, 2019 Declaration of Anders Linderot in Support of Qualcomm’s Reply in Further Support of its <i>Daubert</i> Motion No. 2 to Exclude Portions of the Expert Report of Paul K. Meyer and to Forbid Improper Extrapolation of Dr. Valenti’s Opinions (“Linderot Declaration Exhibits”)
1021	Qualcomm	Unredacted Opposition to Apple’s and the Contract Manufacturers’ Motion for Determination of French Law Pursuant to Federal Rule of Civil Procedure 44.1 (“Opposition Brief”), Exhibits 7, 27-31 and 33 to the March 8, 2019 Declaration of

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		Nathan E. Denning in Support of Qualcomm’s Opposition Brief (“Denning Decl. Exhibits”)
1033	Qualcomm	Exhibits 68-69, 71-74 and 77 to the March 15, 2019 Declaration of Nathan E. Denning in Support of Qualcomm’s Reply Memorandum in Further Support of Its Motion for Determination of French Law Pursuant to Federal Rule of Civil Procedure 44.1 (“Denning Decl. Exhibits”)
1049	Qualcomm	Exhibit 1 to the Declaration of Nathan E. Denning in Support of the Motion Regarding BCPA Evidence (“Exhibit”)
1052	Apple, Qualcomm, and CMs	Unredacted versions of Attachments 1A-1B, 1G-1J, 2A-2B and 8 to the parties’ Final Joint Trial Notebook (“Trial Notebook Attachments”)
1056	Apple	Portions of Apple and the Contract Manufacturers’ Opposition to Qualcomm Incorporated’s Motion Regarding BCPA Evidence (“Opposition”), and certain exhibits to the Appendix of Exhibits in support of the Opposition
1059	Qualcomm	Unredacted Motion To Set the Order of Presentation at Trial and To Permit the Presentation of Limited Evidence Outside the Presence of the Jury (“Motion”)