

# EXHIBIT A

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS

*In re* Ex Parte Application of  
APPLE INC.; APPLE RETAIL  
GERMANY GMBH; and APPLE SALES  
INTERNATIONAL,

Applicants,

For an Order Pursuant to 28 U.S.C. § 1782  
Granting Leave to Obtain Discovery from  
Ericsson Inc. for Use in Foreign  
Proceedings.

Case No.  
[PROPOSED] ORDER GRANTING  
APPLE’S EX PARTE APPLICATION  
FOR AN ORDER PURSUANT TO 28  
U.S.C. § 1782 GRANTING LEAVE  
TO OBTAIN DISCOVERY FOR USE  
IN FOREIGN PROCEEDINGS

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This matter comes before the Court on the *Ex Parte* Application of Apple Inc.; Apple Retail Germany GmbH; and Apple Sales International (“Apple”) for an Order to Obtain Discovery for Use in Foreign Proceedings pursuant to 28 U.S.C. § 1782(a) (the “Application”), which seeks documents from Ericsson Inc. (“Ericsson”) in connection with various foreign patent litigations pending between Apple and Motorola, Inc., Motorola Mobility, Inc. and their affiliates.

The Court, having fully considered the papers on file and submitted herewith, and good cause appearing:

**HEREBY GRANTS** the Application of Apple.

**IT IS HEREBY ORDERED THAT APPLE IS GRANTED LEAVE TO** issue a subpoena for documents in substantially the form attached as Exhibit B to the Application, directing Ericsson to produce the documents requested in the subpoena at the offices of counsel for Apple, Covington & Burling LLP, One Front Street, San Francisco, CA or another location mutually agreeable to Apple and Ericsson.

It is further **ORDERED** that copies of the Application and Memorandum in Support thereof and this Order shall be mailed to the following:

Ericsson Inc.  
6300 Legacy Drive, Plano, Texas, 75025

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_  
United States District Judge