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13 Attorneys for SAMSUNG ELECTRONICS CO.,
14 LTD., SAMSUNG ELECTRONICS AMERICA,
15 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
22 Korean business entity; SAMSUNG
23 ELECTRONICS AMERICA, INC., a New
24 York corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

25 Defendant.

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF VICTORIA F.
MAROULIS IN SUPPORT OF
SAMSUNG'S MOTION TO SHORTEN
TIME**

1 I, Victoria F. Maroulis, declare as follows:

2 1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively, "Samsung"). I submit this declaration in
5 support of Samsung's Motion to Shorten Time for Briefing and Hearing on its Motion for Stay of
6 August 24, 2012 Judgment Under *Fed. R. Civ. P.* 62(b) ("Motion for Stay"). I have personal
7 knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and
8 would testify to such facts under oath.

9 2. On August 26, 2012, I contacted counsel for Apple via email in order to propose a
10 shortened briefing schedule whereby Samsung would file its Motion for Stay on August 27, Apple
11 would file its opposition by August 29, Samsung would file its reply by August 30, and the Court
12 would rule on Samsung's Motion for Stay without oral argument.

13 3. Apple responded to my message indicating that it would oppose a shortened
14 briefing schedule. Attached hereto as Exhibit 1 is a true and correct copy of my email exchange
15 with counsel for Apple.

16 4. The relief requested in Samsung's Motion to Shorten Time is necessary in order to
17 allow the Court to decide Samsung's Motion for Stay in an expedited manner. If the Court does
18 not grant briefing on shortened time, the Motion for Stay would essentially be rendered
19 meaningless because in order to avoid execution on the Judgment, Samsung will need to file a
20 notice of appeal, arrange an appellate bond, and seek Court approval of that bond to obtain an
21 automatic stay pending appeal under *Fed. R. Civ. P.* 62(d), all before the September 7, 2012
22 expiration of the 14 day stay under *Fed. R. Civ. P.* 62(a). This burden and expense may be
23 unnecessary if the Court grants the Motion for Stay and rules in favor of Samsung on one or more
24 of its post-trial motions. In addition, the procedural confusion attendant to filing a notice of
25 appeal prior to resolution of Samsung's post-trial motions will also be avoided if the Motion for
26 Stay is granted promptly.

27 5. The present request to shorten the briefing and hearing schedule on Samsung's
28 Motion for Stay will not affect the schedule of the case.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on August 27, 2012, at Redwood Shores, California.

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5 /s/ Victoria F. Maroulis
6 Victoria F. Maroulis
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