

1 [COUNSEL LISTED ON SIGNATURE PAGES]

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UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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SAN JOSE DIVISION

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12 APPLE INC.,

13 Plaintiff,

14 v.

15 SAMSUNG ELECTRONICS CO., LTD., A
16 Korean business entity; SAMSUNG
17 ELECTRONICS AMERICA, INC., a New York
18 corporation; SAMSUNG
19 TELECOMMUNICATIONS AMERICA, LLC, a
20 Delaware limited liability company,

21 Defendant.

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Case No. 11-cv-01846-LHK (PSG)

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE
FOR ENFORCING JUDGMENT
AND CERTAIN POST-VERDICT
FILINGS**

1 Pursuant to Civil L.R. 6-2, Apple Inc. (“Apple”) and Samsung Electronics Co., Ltd.,
 2 Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC
 3 (collectively “Samsung”) file this Stipulation regarding the schedule for enforcement of the
 4 verdict or judgment entered by the Court and the filing of any bill of costs or motion for
 5 attorney’s fees.

6 WHEREAS, the parties wish to avoid burdening the Court with unnecessary or multiple
 7 stages of filings while post-trial motions are pending;

8 NOW THEREFORE, IT IS HEREBY STIPULATED and agreed to by and between the
 9 parties, subject to the approval of the Court, that:

10 1. Any attempt to execute or enforce the judgment, award, or verdict entered in favor
 11 of Apple and against Samsung (Dkt. Nos. 1931, 1933) shall be stayed until 14 days after the
 12 Court enters judgment resolving all post-trial motions filed pursuant to Rules 50, 52, 59, and 60
 13 (but excluding any bill of costs or motion for attorney’s fees under Rule 54); and on the basis of
 14 this stipulation Samsung hereby withdraws without prejudice its Motion for Stay of August 24,
 15 2012 Judgment (Dkt. No. 1941).

16 2. Any motion for attorney’s fees under Rule 54 shall be filed 14 days after the Court
 17 enters judgment resolving all post-trial motions filed pursuant to Rules 50, 52, 59, and 60. The
 18 parties agree to abide by the following deadlines and page limits for any motion for attorney’s
 19 fees:

Filing	Deadline
Motion for attorney’s fees (max. 20 pages plus supporting documentation showing fees)	14 days after entry of judgment resolving all post-trial motions filed under Rules 50, 52, 59, and 60
Opposition (max. 20 pages)	14 days after motion is filed
Reply (max. 10 pages)	7 days after opposition is filed
Hearing (if necessary)	TBD by Court

1 3. Any bill of costs under Rule 54 shall be filed 14 days after the Court enters
2 judgment resolving all post-trial motions filed pursuant to Rules 50, 52, 59, and 60. The parties
3 agree to abide by the following deadlines and page limits for any bill of costs:

Filing	Deadline
Bill of costs	14 days after entry of judgment resolving all post-trial motions filed under Rules 50, 52, 59, and 60
Objections to bill of costs	14 days after bill of costs is filed
Objections to the Clerk’s taxation of costs (max. 15 pages)	5 court days after the Clerk files the taxing of costs
Response to objections (max. 15 pages)	3 court days after objections to the Clerk’s taxation of costs are filed
Hearing (if necessary)	TBD by Court

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IT IS SO STIPULATED.

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ORDER

Based on the foregoing stipulation,

IT IS SO ORDERED.

Dated:

The Honorable Lucy H. Koh
United States District Judge

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ATTESTATION OF E-FILED SIGNATURE

I, Jason R. Bartlett, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Victoria Maroulis and Michael Jacobs have concurred in this filing.

Dated: September 3, 2012

_____/s/_____
Jason R. Bartlett