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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 JOBY MARTIN IN
SUPPORT OF SAMSUNG'S MOTION TO
SHORTEN TIME**

1 I, Joby Martin, declare as follows:

2 1. I am an associate 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 for Order Permitting Cross-Use of Discovery Material from Case
6 No. 12-630 (the "Motion for Cross-Use of Discovery"). I have personal knowledge of the facts
7 set forth in this declaration and, if called upon as a witness, I could and would testify to such facts
8 under oath.

9 2. On October 19, 2012, my colleague Robert Becher contacted counsel for Apple via
10 email in order to propose a shortened briefing schedule whereby Samsung would file its Motion
11 for Cross-Use of Discovery on October 19, 2012, Apple would file its opposition brief by October
12 23, 2012, Samsung would waive its right to file a reply brief, and the Motion for Cross-Use of
13 Discovery would be submitted on the papers.

14 3. Apple responded to Mr. Becher's message indicating that it does not oppose
15 shortening time on the briefing schedule for the Motion for Cross-Use of Discovery, but that it
16 requests to file its opposition brief on October 25, 2012. Attached hereto as Exhibit 1 is a true and
17 correct copy of the email exchange with counsel for Apple.

18 4. The relief requested in Samsung's Motion to Shorten Time is necessary in order to
19 allow the Court to decide Samsung's Motion for Cross-Use of Discovery before the close of
20 briefing on Apple's Motion for Permanent Injunction, and so that Samsung may know what
21 evidence will be permitted by the Court in support of Samsung's opposition to Apple's injunction
22 motion.

23 5. The present request to shorten the briefing and hearing schedule on Samsung's
24 Motion for Cross-Use of Discovery will not affect the schedule of the case.

25 I declare under penalty of perjury under the laws of the United States that the foregoing is
26 true and correct. Executed on the 19th of October, 2012, in Los Angeles, California.

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/s/ Joby Martin

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GENERAL ORDER ATTESTATION

I, Victoria F. Maroulis, 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 Joby Martin has concurred in this filing.

/s/ Victoria Maroulis