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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION  
15

16 APPLE INC., a California corporation,

17 Plaintiff,

18 v.

19 SAMSUNG ELECTRONICS CO., LTD., a  
20 Korean corporation; SAMSUNG  
ELECTRONICS AMERICA, INC., a New  
21 York corporation; and SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
22 LLC, a Delaware limited liability company,

23 Defendants.  
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Case No. 11-cv-01846-LHK

**APPLE'S ADMINISTRATIVE  
MOTION FOR LEAVE TO FILE  
APPLE'S BRIEF IN RESPONSE TO  
SAMSUNG'S REQUEST FOR  
ADDITIONAL DEPOSITIONS**

1 Apple requests leave to file a Response to Samsung's request in Samsung's Opposition  
2 to Apple's Motion to Compel Depositions (Dkt. No. 2090) because Samsung's Opposition  
3 includes an improper cross motion to compel the depositions of Mr. Musika, Ms. Robinson, Mr.  
4 Schiller, and Dr. Winer. As explained in the Response attached hereto as Exhibit A, Apple  
5 waived its reply, but when it did so, it had no reason to expect that Samsung would add a  
6 previously undisclosed request for discovery in its Opposition.

7 Apple requests leave to file the accompanying response in order to oppose Samsung's  
8 cross motion to compel. Samsung did not respond to this request, as confirmed in the  
9 accompanying declaration of Richard Hung.

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11 Dated: October 28, 2012

MORRISON & FOERSTER LLP

12 By: /s/ Michael A. Jacobs  
13 Michael A. Jacobs  
14 Attorneys for Plaintiff  
15 APPLE INC.