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

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

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

26 Defendants.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S OPPOSITION TO APPLE'S
SECOND ADMINISTRATIVE MOTION
RE ENLARGING PAGE LIMIT FOR
APPLE'S REPLY IN SUPPORT OF
MOTION FOR PERMANENT
INJUNCTION AND FOR ENHANCED
DAMAGES**

1 Continuing to burden the Court with unnecessary briefing, Apple has now filed yet another
2 administrative motion (Dkt. 2099). Its latest motion seeks leave to file a reply brief in support of
3 another administrative motion (Dkt. 2092) that, in turn, had sought a one-sided, 66% increase in
4 pages for Apple's reply brief in support of its injunction and enhancements motion.

5 The parity embodied in both the Local Rules and the Court's briefing Order (Dkt. 1945)
6 warrant denial of Apple's administrative motions. Apple could have requested additional pages
7 at any time after the Court's August 28 briefing order, or it could have brought a request for
8 injunctive relief that was reasonable in scope. Apple did neither. To the extent they are not
9 simply inherent in a motion for injunctive relief, all the complexities to which Apple now points as
10 justifying additional pages are the result of the scope of Apple's own motion, and apply equally to
11 Samsung's briefing. But Samsung already complied with the Court's post-trial briefing order by
12 filing a 35-page opposition to Apple's opening brief (which itself was already five pages longer
13 than the Local Rules typically permit), understanding the Court's briefing limits would be
14 enforced against both parties.

15 Apple already benefits from a 10-page disparity in the briefing on Apple's injunction and
16 enhancements motion. Parity requires that if Apple receives even more additional pages,
17 Samsung should receive a sur-reply of equal length to maintain the briefing ratios previously
18 ordered by the Court and to which Apple never objected.

19
20 DATED: October 28, 2012 QUINN EMANUEL URQUHART & SULLIVAN, LLP

21 By /s/ Victoria F. Maroulis

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