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15 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
17

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

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

26 Defendants.
27

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

**DECLARATION OF VICTORIA F.
MAROULIS IN SUPPORT OF
STIPULATION REGARDING
SCHEDULE FOR BRIEFING
SAMSUNG'S MOTION TO COMPEL
DEPOSITIONS OF APPLE REPLY
EXPERT DECLARANTS**

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 have personal knowledge of the
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such
6 facts under oath.

7 2. On November 14 and 16, 2012, my colleague Robert Becher contacted counsel for
8 Apple via email and proposed a shortened briefing schedule regarding Samsung's Motions to
9 Compel. After negotiations, the parties agreed that Samsung will file its Motions to Compel by
10 noon on November 16, 2012, Apple will file its opposition by November 20, 2012, Samsung
11 waives its right to a reply brief, and the parties waive oral argument. Attached hereto as **Exhibit 1**
12 is a true and correct copy of the email exchange with counsel for Apple.

13 3. The relief requested in the Stipulation is necessary in order to allow the Court to
14 decide Samsung's Motion to Compel sufficiently in advance of the December 6, 2012 hearing on
15 Apple's Motion for a Permanent Injunction and for Damages Enhancements and Apple's Motion
16 for Judgment as a Matter of Law, New Trial and Amended Judgment so that there is time for
17 Samsung to take the requested depositions and submit the requested additional briefing. If the
18 time for briefing were not shortened, the Motion would not be decided until after the December 6,
19 2012 hearing.

20 4. The Court has granted several motions filed by both parties to shorten time. As a
21 recent example, Samsung filed a motion to shorten time for briefing on its Motion for Order
22 Permitting Cross-Use of Discovery Material from Case No. 12-cv-00630-LHK. (Dkt. No. 2071).
23 The Court required Apple to file a response to Samsung's motion on a shortened schedule. (Dkt.
24 No. 2078).

25 5. The requested time modification will not affect the schedule of the case.
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed on the 16th day of November, 2012, at Los Angeles, California.

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5 /s/ Victoria F. Maroulis

Victoria F. Maroulis
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