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 INC. and SAMSUNG
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Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

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

Defendants.

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

**JOINT STIPULATION AND
 [PROPOSED] ORDER
 REGARDING UPDATED
 DAMAGES OPINIONS AND
 EXHIBITS**

1 *Additional attorneys for Plaintiff and*
2 *Counterclaim-Defendant APPLE INC.*

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1 WHEREAS on Wednesday evening, July 25, 2012, Apple and Samsung by agreement
2 exchanged documents reflecting financial results updated for periods between April and
3 June 2012 (referred to as "Updated Financial Results").

4 WHEREAS Apple and Samsung by agreement exchanged damages calculations revised to
5 reflect the Updated Financial Results in the afternoon and evening of July 28, 2012.

6 WHEREAS Apple and Samsung by agreement exchanged updated plaintiff's and
7 defendant's exhibits that incorporate the Updated Financial Results in the afternoon and evening
8 of July 28, 2012.

9 WHEREAS the Updated Financial Results are relevant to claims for monetary relief at
10 trial.

11 WHEREAS after May 12, 2012, actions of the parties and orders entered by the Court
12 have changed the intellectual property being asserted and the products being accused (referred to
13 as "Changes to the Intellectual Property Claims").

14 WHEREAS the materials exchanged on July 28 were revised to reflect the Changes to the
15 Intellectual Property Claims.

16 NOW THEREFORE the parties stipulate as follows:

- 17 1. Neither party will object to the opinions of the opposing party's damages expert because it
18 includes the Updated Financial Results or the Changes to the Intellectual Property Claims.
 - 19 2. The parties agree that the sponsoring party may substitute the following plaintiff's and
20 defendants' trial exhibits, updated to reflect the Updated Financial Results or Changes to
21 the Intellectual Property Claims, as exchanged on or since Wednesday, July 25, 2012:
22 PX25, PX102, PX103, PX180, PX181, DX676, DX703, DX704, DX781. Neither party
23 will object to the updated versions on the ground that they include Updated Financial
24 Results or Changes to the Intellectual Property Claims.
 - 25 3. All other objections to the content of the experts' opinions and the admission of exhibits
26 are preserved. By this stipulation, neither party agrees to the admission of the exhibits
27 identified in paragraph 2.
- 28

1 Dated: July 30, 2012

2 MORRISON & FOERSTER LLP

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5 By: /s/ Michael A. Jacobs

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AMERICA, INC., AND SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC.

[PROPOSED] ORDER

Based on the foregoing stipulation,

IT IS SO ORDERED.

Dated: July _____, 2012

HONORABLE LUCY H. KOH
United States District Judge