

1 David A. Nelson (*pro hac vice*)
(Ill. Bar No. 6209623)
2 davenelson@quinnemanuel.com
QUINN EMANUEL URQUHART &
3 SULLIVAN, LLP
191 N. Wacker Drive, Suite 2700,
4 Chicago, Illinois 60606
Telephone: (312) 705-7400
5 Facsimile: (312) 705-7401

6 Karen P. Hewitt (SBN 145309)
kphewitt@jonesday.com
7 Randall E. Kay (SBN 149369)
rekay@jonesday.com
8 Kelly V. O'Donnell (SBN 257266)
kodonnell@jonesday.com
9 JONES DAY
4655 Executive Drive, Suite 1500
10 San Diego, California 92121
Telephone: (858) 314-1200
11 Facsimile: (844) 345-3178

12 Richard S. Zembek (*pro hac vice*)
richard.zembek@nortonrosefulbright.com
13 NORTON ROSE FULBRIGHT US LLP
1301 McKinney, Suite 5100
14 Houston, Texas 77010
Telephone: (713) 651-8360

15 *Attorneys for Plaintiff Qualcomm*
16 *Incorporated*

17 *[Additional counsel identified on*
18 *signature page]*

Juanita R. Brooks, SBN 75934,
brooks@fr.com
Jason W. Wolff, SBN 215819,
wolff@fr.com
Seth M. Sproul, SBN 217711.
sproul@fr.com
Michael A. Amon, SBN 226221.
amon@fr.com
Fish & Richardson P.C.
12390 El Camino Real
San Diego, CA 92130
Phone: 858-678-5070 / Fax: 858-678-
5099

Ruffin B. Cordell, DC Bar No.
445801, *admitted pro hac vice*,
cordell@fr.com
Lauren A. Degnan, DC Bar No.
452421, *admitted pro hac vice*,
degnan@fr.com
Fish & Richardson P.C.
The McPherson Building
901 15th Street, N.W., 7th Floor
Washington, D.C. 20005
Phone: 202-783-5070 / Fax: 202-
783-2331

Attorneys for Defendant Apple Inc.

[Additional counsel identified on
signature page]

18 UNITED STATES DISTRICT COURT
19 SOUTHERN DISTRICT OF CALIFORNIA

20 QUALCOMM INCORPORATED,

21 Plaintiff,

22 vs.

23 APPLE INCORPORATED,

24 Defendant.

25 AND RELATED COUNTERCLAIMS.
26

CASE NO. 3:17-cv-2403-CAB-MDD

**JOINT REQUEST FOR ENTRY OF
AMENDED PROTECTIVE ORDER**

Judge: Cathy Ann Bencivengo

Magistrate Judge:
Hon. Mitchell D. Dembin

1 Plaintiff Qualcomm Incorporated (“Qualcomm”) and Defendant Apple Inc.
2 (“Apple”) hereby jointly request that the Court enter the Amended Protective
3 Order submitted herewith. Having met and conferred, Qualcomm and Apple
4 (collectively the “Parties”) agree and stipulate as follows:

5 WHEREAS, the Parties previously agreed to the terms and limitations set
6 forth in the Protective Order to ensure the protection of the Parties’ confidential
7 information, entered in the above-entitled matter on March 19, 2018 (Dkt. 88);

8 WHEREAS, the Parties have since identified clerical errors in the
9 Protective Order under Sections 7.5-7.8, which have been amended in the
10 proposed Amended Protective Order submitted herewith along with a version that
11 shows the proposed amendments in redline¹;

12 The Parties jointly request that the Court enter the Amended Protective
13 Order submitted as a proposed order with this Motion.

14
15

16 DATED: July 26, 2018

By: /s/ Michelle Ann Clark

17
18
19
20
21
22
23

**QUINN EMANUEL URQUHART &
SULLIVAN, LLP**
David A. Nelson (*pro hac vice*)
(Ill. Bar No. 6209623)
davenelson@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, Illinois 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

24 ¹ The Parties have agreed that the entry of the Amended Protective Order that is
25 the subject of this Joint Request does not require new or additional disclosure for
26 any person(s) previously disclosed and approved under the prior version of the
27 protective order consistent with the process described in Section 7.8 (Dkt. 97).
28 Rather, those individuals who have already been disclosed and approved consistent
with the process described in Section 7.8 shall be deemed disclosed and approved
under the Amended Protective Order now being submitted for consideration.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Sean S. Pak (SBN 219032)
seanpak@quinnemanuel.com
Michael D. Powell (SBN 202850)
mikepowell@quinnemanuel.com
Michelle Ann Clark (SBN 243777)
michelleclark@quinnemanuel.com
Andrew M. Holmes (SBN 260475)
drewholmes@quinnemanuel.com
50 California St, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875-6600
Facsimile: (415) 857-6700

Patrick D. Curran (SBN 241630)
patrickcurran@quinnemanuel.com
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100

Yury Kapgan (SBN 218366)
yurykapgan@quinnemanuel.com
Scott Watson (SBN 219147)
scottwatson@quinnemanuel.com
Michael Louis Fazio (SBN 228601)
michaelfazio@quinnemanuel.com
Joseph Sarles (SBN 254750)
josephsarles@quinnemanuel.com
Valerie A. Lozano (SBN 260020)
valerielozano@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: 213-443-3000
Facsimile: 213-443-3100

JONES DAY

Karen P. Hewitt (SBN 145309)
kphewitt@jonesday.com
Randall E. Kay (SBN 149369)
rekay@jonesday.com
John D. Kinton (SBN 203250)
jkinton@jonesday.com
4655 Executive Drive, Suite 1500
San Diego, California 92121
Telephone: (858) 314-1200
Facsimile: (844) 345-3178

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NORTON ROSE FULBRIGHT US LLP
Richard S. Zembek (Pro Hac Vice)
richard.zembek@nortonrosefulbright.com
Eric B. Hall (pro hac vice forthcoming)
(Tex. Bar No. 24012767)
eric.hall@nortonrosefulbright.com
Daniel S. Leventhal (pro hac vice
forthcoming) (Tex. Bar No. 24050923)
daniel.leventhal@nortonrosefulbright.com
Talbot R. Hansum (pro hac vice
forthcoming)
(Tex. Bar No. 24084586)
talbot.hansum@nortonrosefulbright.com
Fulbright Tower
1301 McKinney, Suite 5100
Houston, TX 77010
Telephone: (713) 651-5151
Attorneys for Plaintiff
Qualcomm Incorporated

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

DATED: July 26, 2018

By: /s/ Michael A. Amon

Juanita R. Brooks, SBN 75934,
brooks@fr.com
Jason W. Wolff, SBN 215819,
wolff@fr.com
Seth M. Sproul, SBN 217711,
sproul@fr.com
Michael A. Amon, SBN 226221,
amon@fr.com
Fish & Richardson P.C.
12390 El Camino Real
San Diego, CA 92130
Phone: 858-678-5070 / Fax: 858-678-5099

Ruffin B. Cordell, DC Bar No. 445801,
Admitted pro hac vice, cordell@fr.com
Lauren A. Degnan, DC Bar No. 452421,
Admitted pro hac vice, degnan@fr.com
Fish & Richardson P.C.
The McPherson Building
901 15th Street, N.W., 7th Floor
Washington, D.C. 20005
Phone: 202-783-5070 / Fax: 202-783-2331

Benjamin C. Elacqua, TX Bar No. 24055443
Admitted pro hac vice, elacqua@fr.com
Fish & Richardson P.C.
1221 McKinney Street, Suite 2800
Houston, TX 77010
Phone: 713-654-5300 / Fax: 713-652-0109

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.