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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

FEDERAL TRADE COMMISSION Plaintiff, v. QUALCOMM INCORPORATED, a Delaware corporation, Defendant.	Case No. 5:17-cv-00220-LHK-NMC **NON-PARTY APPLE INC.'S STATUS REPORT REGARDING DOCUMENT PRODUCTION** Courtroom: 7, 4th Floor Judge: Hon. Nathanael M. Cousins
IN RE QUALCOMM ANTITRUST LITIGATION	Case No. 5:17-md-02773-LHK-NMC

Pursuant to the Court's October 18, 2017 Order on Discovery Disputes (ECF No. 239), Non-Party Apple Inc. ("Apple") submits the following status report regarding its document production in these cases:

Collection of Documents and Uploads to Apple's E-Discovery System: We have substantially completed document collection for all of Apple's custodians. Four sets of supplemental electronic document collections are being uploaded to Apple's e-discovery system, but we believe those documents are largely duplicative of documents already collected and uploaded. We are also in the process of uploading hardcopy documents collected from one custodian.

Search and De-Duplication: After the application of search terms and de-duplication, approximately 6.5 million documents have been slated for review. That number may grow by a small amount based on the ongoing uploading, de-duplication, and processing of documents.

Review and Production: Of the documents slated for review, we have produced approximately 2.6 million documents (16.5 million pages) and determined that approximately 350,000 documents are in document families that are fully non-responsive. We have completed initial review of approximately 1.3 million additional documents, which are in various stages of the quality control process. We anticipate that several hundred thousand documents will clear that process by the middle of next week, at which point the responsive non-privileged documents will move into production.

Review Process: We have over 500 attorneys on document review for this matter, in addition to outside counsel and Apple's in-house litigation support team. In order to facilitate the production of remaining responsive non-privileged documents, we have moved documents that are highly likely to be privileged or protected from discovery to the back of our manual review queue.

As noted in our earlier status reports, in order to expedite the flow of document production and meet the deadlines set by the Court, we are identifying some groups of custodial documents that we will produce without manual review, subject to potential claw-back. Because those documents will not have been manually reviewed, they will be designated "Apple Highly

Confidential-Attorneys' Eyes Only" and produced based on an agreement between counsel that they will only be reviewed by outside counsel pending the entry of a supplemental Protective Order applicable to Apple's production of documents. If counsel for Qualcomm, Class Plaintiffs, or the FTC believe any specific documents should be designated at a lower level of confidentiality, Apple is willing to meet and confer regarding those documents.

Dated: December 15, 2017

Respectfully submitted,

By: */s/ Edward H. Takashima*

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