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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 **QUALCOMM INCORPORATED AND NON-PARTY CONTRACT MANUFACTURERS' JOINT 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 January 17, 2018 Order (ECF No. 493), Defendant Qualcomm Incorporated ("Qualcomm") and non-parties Compal Electronics, Inc., FIH Mobile Ltd., Hon Hai Precision Industry Co., Ltd., Pegatron Corporation, and Wistron Corporation (collectively, the "CMs") submit the following joint status report regarding the CMs' document production in the above-captioned cases.

The Court previously ordered third parties to complete document production by January 5, 2018. (ECF No. 308.) On January 17, 2018, Magistrate Judge Cousins ordered the CMs to complete document production to Qualcomm by January 26, 2018 and to produce a privilege log by February 2, 2018. (ECF No. 493.) On January 18, 2018, Judge Koh extended the CMs' deadline to produce documents to January 26, 2018. (ECF No. 495.)

As of January 25, 2018, the CMs had produced 337,315 total documents in the above-captioned actions. Compal had produced 83,070 documents. Foxconn had produced 107,656 documents. Pegatron had produced 89,629 documents. Wistron had produced 56,960 documents. With their productions dated January 26, 2018, the CMs have completed their production of responsive, non-privileged documents as follows. The CMs have produced over 740,000 documents in response to Qualcomm's subpoenas, including documents from 33 custodians and non-custodial sources. The CMs have completed the review of and have produced all responsive, non-privileged custodial documents returned from the application of the 111 search terms agreed upon by Qualcomm and the CMs and the eight additional search terms that the Court ordered the CMs to apply on January 2, 2018 (including Search Term 154), as well as non-custodial data comprising documents sufficient to show the sales prices of the cellular devices they sell as well as purchases of 3G and 4G baseband chips and modules used in such cellular devices. Certain of the CMs continue to investigate whether additional data regarding the

purchase of chips or sales of devices using older technology (*i.e.*, non-3G or 4G technology) and/or sales of devices to Qualcomm licensees (and purchase of chips used therein) can be obtained and, if so, will produce such data. Qualcomm acknowledges receiving a production of documents from the CMs on January 26, 2018, but it does not have sufficient information to form a view, one way or the other, on whether that production completed the CMs' production of documents.

The CMs represent that they are actively engaged in a good faith effort to compile their privilege logs and anticipate that these will be produced in accordance with the Federal Rules of Civil Procedure and any applicable Local Rules or Court Orders by February 2, 2018 (subject to producing any documents currently believed to be subject to a good faith claim of privilege but later found not to be privileged). (*See* ECF No. 493.)

Dated: January 26, 2018

Respectfully submitted,

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FILER'S ATTESTATION

I, Jason C. Lo, am the ECF user whose identification and password are being used to file this Joint Discovery Statement. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that the signatories on this document have concurred in this filing.

/s/ Jason C. Lo
Jason C. Lo

CERTIFICATE OF SERVICE

I, Jason C. Lo, hereby certify that on January 26, 2018, I electronically filed the above document with the Clerk of the Court using CM/ECF. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system

Dated: January 26, 2018

By: */s/ Jason C. Lo*
Jason C. Lo