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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

QUALCOMM INCORPORATED, a Delaware corporation,

Defendant.

Case No. 5:17-cv-00220-LHK

STIPULATION TO FILE UNDER SEAL PORTIONS OF QUALCOMM AND FTC'S JOINT DISCOVERY STATEMENT REGARDING FTC'S INTERROGATORY RESPONSES

Pursuant to Civil Local Rules 7-11, 7-12 and 79-5, Defendant Qualcomm Incorporated ("Qualcomm") and Plaintiff Federal Trade Commission ("FTC," and together with Qualcomm, the "Parties") jointly submit this Stipulation to permit Qualcomm to file under seal portions of FTC's and Qualcomm's Interrogatory Responses attached as exhibits to Qualcomm and the FTC's Joint Discovery Statement Regarding FTC's Interrogatory Responses ("Joint Discovery Statement").

WHEREAS Qualcomm intends to file the Joint Discovery Statement;

WHEREAS Qualcomm intends to file an administrative motion to file under seal portions of the FTC's and Qualcomm's Interrogatory Responses attached as exhibits to the Joint Discovery Statement;

WHEREAS Qualcomm has submitted and will submit declarations establishing that portions of the FTC's and Qualcomm's Interrogatory Responses are sealable pursuant to Local Rule 79-5(c) and (d);

WHEREAS the requested relief is necessary and narrowly tailored to protect the confidentiality of the materials referenced in the FTC's and Qualcomm's Interrogatory Responses;

NOW, THEREFORE, IT IS HEREBY STIPULATED by the Parties, through their respective counsel of record, and subject to the approval of the Court, that Qualcomm be permitted to file under seal portions of the FTC's and Qualcomm's Interrogatory Responses.

Pursuant to Civil Local Rule 5-1(i), I hereby attest that I have obtained concurrence in the filing of this document from all other signatories.

IT IS SO STIPULATED.

Dated: March 16, 2018

MORGAN LEWIS & BOCKIUS LLP

By: */s/ Geoffrey T. Holtz*
Geoffrey T. Holtz
Attorney for Defendant
QUALCOMM INCORPORATED

Dated: March 16, 2018

FEDERAL TRADE COMMISSION

By: */s/ Jennifer Milici*
Jennifer Milici
Attorney for Plaintiff
Federal Trade Commission