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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-NMC **JOINT CASE MANAGEMENT STATEMENT** DATE: June 20, 2018 TIME: 2:00 p.m. CTRM: Courtroom 8 JUDGE: Hon. Lucy H. Koh
IN RE QUALCOMM ANTITRUST LITIGATION	Case No. 5:17-MD-02773-LHK-NMC

Pursuant to the Court's June 7, 2018 Order Continuing Further Case Management Conference (MDL ECF No. 488), Plaintiff Federal Trade Commission (the "FTC") and the MDL Plaintiffs (collectively, "Plaintiffs") and Defendant Qualcomm Incorporated ("Qualcomm") (collectively, the "Parties") have met and conferred and hereby submit this Joint Case Management Statement, which reports on developments since the Parties filed the June 6, 2018 Joint Case Management Statement (FTC ECF No. 763). The Parties have no issues to present to the Court and respectfully stipulate, subject to the approval of the Court, that the Case Management Conference scheduled for June 20, 2018 may be continued.

I. MOTIONS

Qualcomm and the FTC submitted a joint discovery statement to Judge Cousins on June 9, 2018 regarding the interpretation of the Protective Order with respect to the treatment of certain third-party information in the FTC's expert reports. (FTC ECF No. 765.)

The Parties have not filed any other motions since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

On May 31, the MDL Plaintiffs sent Qualcomm a copy of a proposed amended complaint. On June 12, Qualcomm consented to the filing of the proposed amended complaint. Given the timing of the MDL Plaintiffs' amendment (after the close of fact discovery), Qualcomm and the MDL Plaintiffs have agreed that the MDL Plaintiffs will respond to an additional 5 interrogatories and 10 requests for admission within 15 days of service.

II. PARTY DISCOVERY

A. Written Discovery

There have been no new developments since the June 6 Joint Case Management Statement (FTC ECF No. 763), except as noted in Part I above.

B. Document Discovery Issues

Qualcomm continues the process of re-reviewing documents pursuant to Judge Cousins's April 4, 2018 Order Regarding Privilege Re-Review for Qualcomm and Apple (MDL ECF No. 427). Qualcomm produced additional revised log entries and documents on June 12, 2018. Plaintiffs have sent Qualcomm a list of documents for which they seek to request *in camera*

review, and will meet and confer with Qualcomm in an effort to resolve any privilege disputes before submitting any requests to Judge Cousins.

C. Party Depositions

1. Individual Depositions

There have been no new developments since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

2. Rule 30(b)(6) Depositions

There have been no new developments since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

D. Expert Discovery

There have been no new developments since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

III. THIRD-PARTY DISCOVERY

A. Document Production

There have been no new developments since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

B. Depositions

There have been no new developments since the June 6 Joint Case Management Statement. (FTC ECF No. 763.)

Dated: June 13, 2018

Respectfully submitted,

FEDERAL TRADE COMMISSION,

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Dated: June 13, 2018

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FILER'S ATTESTATION

I, Gary A. Bornstein, am the ECF user whose identification and password are being used to file this Joint Case Management 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/ Gary A. Bornstein
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