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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

| | |
|---|---|
| FEDERAL TRADE COMMISSION<br><br>Plaintiff,<br><br>v.<br><br>QUALCOMM INCORPORATED, a Delaware corporation,<br><br>Defendant.<br><br>IN RE QUALCOMM ANTITRUST LITIGATION | Case No. 5:17-CV-00220-LHK-NMC<br><br>**DEFENDANT QUALCOMM INCORPORATED, PLAINTIFF FEDERAL TRADE COMMISSION AND MDL PLAINTIFFS' JOINT STATUS REPORT**<br><br>Judge: Hon. Nathanael M. Cousins<br><br>Case No. 5:17-MD-02773-LHK-NMC |

Plaintiffs Federal Trade Commission ("FTC") and the MDL Plaintiffs (together, "Plaintiffs") and Defendant Qualcomm Incorporated ("Qualcomm") hereby submit this Joint Status Report pursuant to Magistrate Judge Cousins's March 30, 2018 Order (FTC ECF No. 664) and the April 4, 2018 Order Regarding Privilege Re-Review for Qualcomm and Apple (MDL ECF No. 427; the "Re-Review Order").

**A. Status of Re-Review**

Qualcomm completed the privilege re-review pursuant to the Re-Review Order on June 28, 2018.

Since the last Joint Status Report (FTC ECF No. 769), submitted on June 18, 2018, Qualcomm has made two productions as a result of the re-review, which were completed on June 26 and 28, 2018. On June 26, Qualcomm produced revised privilege log entries for 3,982 documents that remained on its privilege logs after re-review, as well as new log entries for 2,062 previously redacted documents in which redactions were not changed. Qualcomm produced 1,451 documents (either in redacted form or without redactions) that had previously been withheld as privileged, and Qualcomm produced 599 previously redacted documents on which it reduced or eliminated redactions. The newly redacted documents, including those produced from Qualcomm's privilege log and those produced with reduced redactions, were logged as well.

On June 28, Qualcomm produced revised privilege log entries for 84 documents that remained on its privilege logs after re-review, as well as new log entries for 56 previously redacted documents in which redactions were not changed. Qualcomm produced 67 documents (either in redacted form or without redactions) that had previously been withheld as privileged, and Qualcomm produced 30 previously redacted documents on which it reduced or eliminated redactions. The newly redacted documents, including those produced from Qualcomm's privilege log and those produced with reduced redactions, were logged as well.

Qualcomm estimates that it completed re-review of a total of 110,855 redacted or withheld documents. As a result of this re-review process, Qualcomm has produced 21,804

documents (either in redacted form or without redactions) that had previously been withheld as privileged, and 11,388 previously redacted documents on which it reduced or eliminated redactions. Some but not all of the previously withheld or redacted content had already been produced in other documents before the re-review productions.

**B. Status of Meet and Confer Regarding *In Camera* Review**

On July 16, 2018, Qualcomm and the Plaintiffs met and conferred with respect to 15 documents that Plaintiffs intended to request permission to submit for *in camera* review. During this meet and confer, Qualcomm withdrew its assertion of privilege for nine of the documents and provided additional explanation for the basis of the privilege assertions for the remaining six documents. As a result of this meet and confer, Plaintiffs are not requesting that the Court conduct an *in camera* review of the six documents over which Qualcomm is continuing to maintain privilege.

Dated: July 16, 2018

Respectfully submitted,

FEDERAL TRADE COMMISSION,

*/s/ Daniel Matheson*

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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 Status Report. 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*

Gary A. Bornstein