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 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,
 19 Plaintiff,
 20 vs.
 21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF ROSA KIM IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Rosa Kim, declare:

2 1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this Declaration in
3 support of Samsung's Administrative Motion to File Documents Under Seal, as well as Apple's
4 Administrative Motion to File Under Seal (Dkt. No. 986). I have personal knowledge of the facts
5 set forth in this Declaration and, if called as a witness, could and would competently testify to
6 them.

7 2. The requested relief is necessary to protect the confidentiality of information
8 contained in Exhibit A to the Declaration of Marc J. Pernick In Support of Apple's Opposition to
9 Samsung's Motion For Clarification ("Pernick Declaration"), Samsung's Reply In Support of
10 Motion For Clarification Regarding the Court's May 4, 2012 Order, as well as the supporting
11 declarations of Dr. Jeffrey Johnson ("Johnson Declaration") and Mark Tung ("Tung Declaration")
12 and exhibits thereto.

13 3. Exhibit A to the Pernick Declaration consists of excerpts from the expert report of
14 Dr. Ravin Balakrishnan. This document contains discussion of Samsung source code, as well as
15 confidential business information regarding the operation of the accused Samsung devices. This
16 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
17 competitors if it were not filed under seal.

18 4. Exhibit 4 to the Tung Declaration consists of excerpts from the April 20, 2012
19 deposition transcript of Apple's infringement expert, Dr. Ravin Balakrishnan, which is designated
20 as HIGHLY CONFIDENTIAL — ATTORNEY'S EYES ONLY. This document contains
21 discussion of Samsung source code, as well as confidential business information regarding the
22 operation of the accused Samsung devices. This information is confidential and proprietary to
23 Samsung, and could be used to its disadvantage by competitors if it were not filed under seal.

24 5. The Johnson Declaration contains discussion of Samsung source code, as well as
25 confidential business information regarding the operation of the accused Samsung devices. This
26 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
27 competitors if it were not filed under seal.

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I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on June 5, 2012.

/s/ Rosa Kim
Rosa Kim

