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16 Attorneys for Samsung Electronics America, Inc.
 17 and Samsung Telecommunications America LLC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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

CASE NO. 11-cv-01846-LHK
**DECLARATION OF EUNHA KIM IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Eunha Kim, declare:


2 1. I am a director at Samsung Information Systems America, Inc., which is wholly
3 owned by Samsung Electronics America. I have personal knowledge of the facts set forth in this
4 declaration and, if called upon as a witness, I could and would testify to such facts under oath.

5 2. Pursuant to Civil Local Rule 79-5 and General Order No. 62, I make this
6 Declaration in support of Samsung's Administrative Motion to File Under Seal the Declaration of
7 Eunha Kim in support of Samsung's Opposition to Plaintiff's Motion to Expedite Discovery (the
8 "Kim" Declaration), and Exhibits 1-3 attached to that declaration.

9 3. The requested relief is necessary and narrowly tailored to protect the confidentiality
10 of the information contained in the Kim Declaration and accompanying exhibits. Specifically, the
11 Kim Declaration contains detailed, highly confidential information regarding Samsung's conduct
12 of prior litigations. This information provides an insight into how Samsung manages its
13 litigations, in particular patent litigations, and this information could be used by future litigants to
14 Samsung's disadvantage. The exhibits also contain the detailed billing records submitted by its
15 former counsel. These records provide further insight into Samsung's litigation tactics and
16 strategies with regards to patent litigation

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct. Executed in San Jose, CA on July 11, 2011.

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By 
Eunha Kim