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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
 25 ELECTRONICS AMERICA, INC., a New
 26 York corporation; SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 27 Defendants.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF AUSTIN TARANGO
 IN SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

**Date: August 18, 2011
 Time: 1:30 pm
 Place: Courtroom 4, 5th Floor
 Judge: Hon. Lucy H. Koh**

1 I, Austin Tarango, declare:

2 1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
4 Telecommunications America, LLC. I have personal knowledge of the facts set forth in this
5 declaration and, if called upon as a witness, I could and would testify to such facts under oath.

6 2. On July 11, 2011, I e-mailed counsel for Apple, Inc. (“Apple”) requesting that
7 Apple stipulate to the filing under seal of Eunha Kim’s Declaration in Support of Samsung’s
8 Motion to Disqualify Bridges & Mavrakakis LLP and attached Exhibits 1-3. I requested that
9 counsel for Apple let me know by 7:00 p.m. today whether Apple would so stipulate. I also
10 placed calls to Apple’s counsel at Morrison & Foerster to confirm this stipulation but was unable
11 to reach anyone in their offices.

12 3. Mr. Pieja from Bridges & Mavrakakis was the only attorney representing Apple
13 that responded to my e-mail. Mr. Pieja stated that he would not respond today to my e-mail but
14 said that he expected to provide a response tomorrow.

15 I declare under penalty of perjury under the laws of the United States that the foregoing is
16 true and correct. Executed in Redwood Shores, CA on July 11, 2011.

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18
19 By /s/ Austin Tarango
Austin Tarango