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 CO., LTD., SAMSUNG ELECTRONICS  
 14 AMERICA, INC. and SAMSUNG  
 TELECOMMUNICATIONS AMERICA, LLC  
 15

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 TODD BRIGGS IN  
 SUPPORT OF SAMSUNG'S  
 ADMINISTRATIVE MOTIONS TO FILE  
 DOCUMENTS UNDER SEAL**

1 I, Todd Briggs, declare:

2 1. I am a partner with 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 (collectively, "Samsung"). I submit this Declaration in  
5 support of Samsung's Administrative Motions to File Documents Under Seal (Dkt. Nos. 1067 and  
6 1074). I have personal knowledge of the facts set forth in this Declaration and, if called as a  
7 witness, could and would competently testify to them.

8 2. The requested relief is necessary to protect the confidentiality of information  
9 contained in the following documents:

- 10 a. The confidential, unredacted version of the Declaration of Brian von Herzen  
11 in Support of Samsung's Motion to Strike Expert Testimony Based on  
12 Undisclosed Facts and Theories ("von Herzen Declaration"); and  
13 b. The confidential, unredacted version of the Declaration of Trevor Darrell in  
14 Support of Samsung's Motion to Strike Expert Testimony Based on  
15 Undisclosed Facts and Theories ("Darrell Declaration").

16 3. Paragraphs 21-34 of the von Herzen Declaration contain confidential patent  
17 analyses. This information is confidential to Samsung and could be used to its disadvantage by  
18 competitors if it were not filed under seal. To the extent the von Herzen Declaration also  
19 contains Apple Inc.'s ("Apple's") confidential information, Samsung understands that Apple will  
20 file the declaration required by Civil L.R. 79-5(d) permitting its sealing.

21 4. Paragraphs 22-33 of the Darrell Declaration contain confidential patent analyses.  
22 This information is confidential to Samsung and could be used to its disadvantage by competitors  
23 if it were not filed under seal. To the extent the Darrell Declaration also contains Apple Inc.'s  
24 ("Apple's") confidential information, Samsung understands that Apple will file the declaration  
25 required by Civil L.R. 79-5(d) permitting its sealing.  
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I declare under penalty of perjury that the foregoing is true and correct. Executed in  
Redwood Shores, California on June 8, 2012.

/s/ Todd Briggs\_\_\_\_\_

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**General Order 45 Attestation**

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Todd Briggs has concurred in this filing.

/s/ Victoria Maroulis