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11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

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

Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF MIA MAZZA
 IN SUPPORT OF APPLE'S
 MOTION TO STRIKE
 SAMSUNG'S OPPOSITION TO
 NOTICE OF MOTION FOR
 CLARIFICATION OF APRIL 12,
 2012 ORDER**

1 I, MIA MAZZA, declare as follows:

2 1. I am a partner in the law firm of Morrison & Foerster LLP, counsel for Apple Inc.
3 (“Apple”). I am licensed to practice law in the State of California and admitted to practice before
4 this Court. I have personal knowledge of the matters stated herein or understand them to be true
5 from outside counsel for Apple in other matters identified below. I make this declaration in
6 support of Apple’s Motion to Strike Samsung’s Opposition to Apple’s Notice of Motion for
7 Clarification of April 12 Order

8 2. Attached hereto as **Exhibit A** is a true and correct copy of a letter I sent to counsel
9 for Samsung dated June 8, 2012.

10 3. Attached hereto as **Exhibit B** is a true and correct copy of an email I received from
11 counsel for Samsung dated June 8, 2012.

12 4. Apple has produced unredacted versions of all court documents from the *Motorola*
13 matters pending in the Northern District of Illinois and the ITC (Inv. No. 337-TA-750) with the
14 exception of documents containing Confidential Business Information of nine nonparties who
15 have not responded to Apple’s multiple requests for consent or have affirmatively refused to
16 consent. Apple has produced redacted versions of these remaining Motorola documents
17 involving nine nonparties’ CBI, with the exception of fifteen documents that were withheld in
18 their entirety because they could not meaningfully be redacted. On June 11, 2012, counsel for
19 Apple sent counsel for Samsung a list of those fifteen documents, identifying the third party
20 involved in each.

21 5. Apple has produced unredacted versions of all court documents from the *HTC* case
22 pending in the District of Delaware, with the exception of four documents containing Google
23 CBI, to which production Google has objected. Apple has produced redacted versions of those
24 four documents.

25 6. After having given Elan notice and an opportunity to seek a protective order,
26 Apple has now produced unredacted versions of all court documents from the *Elan* case litigated
27 in the Northern District of California.
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7. Outside counsel for Apple in the *Elan* ITC investigation prepared a proposed redacted set of confidential documents from that matter and provided it to counsel for Elan. Elan has requested more time to review the confidential documents before they may be provided to counsel for Apple or Samsung in this matter. Outside counsel for Apple in the *Elan* matter therefore has declined to provide the confidential documents for production to Samsung at this time.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of June, 2012 at San Francisco, California.

/s/ Mia Mazza
Mia Mazza

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ATTESTATION OF E-FILED SIGNATURE

I, Jason R. Bartlett, 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 Mia Mazza has concurred in this filing.

Dated: June 12, 2012

/s/ Jason R. Bartlett
Jason R. Bartlett