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14 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 15 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
 19

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

CASE NO. 11-cv-01846-LHK
**DECLARATION OF BILL TRAC IN
 SUPPORT OF APPLE'S
 ADMINISTRATIVE MOTIONS TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Bill Trac, declare:

2 1. I am an associate with the law firm Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Telecommunications America, LLC, and
4 Samsung Electronics America, Inc. (collectively “Samsung”). I submit this declaration in support
5 of Apple Inc.’s (“Apple’s”) Administrative Motions to File Documents Under Seal (Dkt. Nos.
6 1052, 1056, and 1059). I have personal knowledge of the facts set forth in this declaration, except
7 as otherwise noted, and, if called as a witness, could and would testify to those facts under oath.

8
9 2. The requested relief is necessary to protect the confidentiality of information
10 contained in Apple’s Reply in Support of its Motion for Summary Judgment (“MSJ Reply”) (Dkt.
11 1052), the Reply Declaration of Marc Pernick in Support of Apple’s Motion to Strike Portions of
12 Samsung’s Expert Reports (“Pernick Declaration”) (Dkt. 1056), and Apple’s Reply in Support of
13 its Motion to Exclude Testimony of Samsung’s Experts (“*Daubert* Reply”) (Dkt. 1059).

14
15 3. The May 24, 2012 Declarations of Joby Martin in Support of Apple’s
16 Administrative Motions to File Documents Under Seal (“May 24 Samsung Declarations”) (Dkt.
17 Nos. 975, 976), and the June 1 Declarations of Ketan Patel and Hankil Kang in Support of
18 Samsung’s Administrative Motions to File Under Seal (“June 1 Samsung Declarations”) (Dkt.
19 Nos. 1008, 1016) in connection with Apple’s motions and Samsung’s oppositions are incorporated
20 by reference as if fully set out herein.

21
22 4. It is Samsung’s policy not to disclose or describe the design or development of
23 products that it releases. This information is confidential to Samsung. Such information may used
24 by Samsung’s competitors to Samsung’s disadvantage.

25
26 5. The confidential, unredacted version of Apple’s MSJ Reply (Dkt. 1052) discusses
27 and/or references the information described in the May 24 Samsung Declarations and the June 1
28 Samsung Declarations and should be sealed for the same reasons.

1 6. Exhibits 10 and 11 to the Pernick Declaration consist of tables prepared by Apple's
2 experts based on highly confidential documents produced by Samsung. The tables reflect
3 Samsung's internal, confidential financial data and could be used to Samsung's detriment by its
4 competitors. The documents containing Samsung's financial data were marked HIGHLY
5 CONFIDENTIAL – ATTORNEYS' EYES ONLY. Exhibits 10 and 11 should therefore be
6 sealed.
7

8 7. The confidential, unredacted version of the Pernick Declaration consists of
9 information describe in paragraph 6 above and should be sealed for the same reason.

10 8. The confidential, unredacted version of Apple's *Daubert* Reply (Dkt. 1059)
11 discusses and/or references the information described in the May 24 Samsung Declarations and
12 the June 1 Samsung Declarations and should be sealed for the same reasons.
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15 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
16 Francisco, California on June 14, 2012.

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18 /s/ Bill Trac
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GENERAL ORDER ATTESTATION

I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing Declaration. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Bill Trac.

Date: June 14, 2012

/s/ Victoria Maroulis