

1 HAROLD J. MCELHINNY (CA SBN 66781)  
 hmcclhinny@mofo.com  
 2 MICHAEL A. JACOBS (CA SBN 111664)  
 mjacobs@mofo.com  
 3 JENNIFER LEE TAYLOR (CA SBN 161368)  
 jtaylor@mofo.com  
 4 ALISON M. TUCHER (CA SBN 171363)  
 atucher@mofo.com  
 5 RICHARD S.J. HUNG (CA SBN 197425)  
 rhung@mofo.com  
 6 JASON R. BARTLETT (CA SBN 214530)  
 jasonbartlett@mofo.com  
 7 MORRISON & FOERSTER LLP  
 425 Market Street  
 8 San Francisco, California 94105-2482  
 Telephone: (415) 268-7000  
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE  
 william.lee@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 60 State Street  
 Boston, MA 02109  
 Telephone: (617) 526-6000  
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)  
 mark.selwyn@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 950 Page Mill Road  
 Palo Alto, California 94304  
 Telephone: (650) 858-6000  
 Facsimile: (650) 858-6100

Attorneys for Plaintiff and  
 Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

APPLE INC., a California corporation,  
 Plaintiff,  
 v.  
 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG  
 ELECTRONICS AMERICA, INC., a New York  
 corporation; and SAMSUNG  
 TELECOMMUNICATIONS AMERICA, LLC,  
 a Delaware limited liability company,  
 Defendants.

Case No. 11-cv-01846-LHK (PSG)  
**DECLARATION OF CYNDI WHEELER  
 IN SUPPORT OF SAMSUNG'S  
 ADMINISTRATIVE MOTIONS TO FILE  
 DOCUMENTS UNDER SEAL**

1 I, Cyndi Wheeler, hereby declare as follows:

2 1. I am an attorney for Apple Inc. (“Apple”). I submit this declaration in support of  
3 Samsung’s Administrative Motions to File Under Seal (Dkt. Nos. 1088 and 1090) pursuant to  
4 Local Rules 7-11 and 79-5. I have personal knowledge of the matters set forth below. If called as  
5 a witness I could and would competently testify as follows.

6 **Declaration of Adam S. Cashman in Support of Samsung’s Opening Memorandum**  
7 **Regarding Claim Construction (“Cashman Declaration”) (Dkt. No. 1091)**

8 2. Exhibit 4 to the Cashman Declaration is a copy of an excerpt of the transcript of  
9 the March 27, 2012 deposition of David Bungo. Exhibit 4 contains trade secret information  
10 reflecting: Apple’s product design process, specifics regarding the iPad design project, and the  
11 inner workings of Apple’s industrial design group. This exhibit also contains discussion of  
12 documents marked as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY as well as  
13 extensive references to confidential internal code names. This information is highly sensitive and  
14 could be used by Apple’s competitors to Apple’s disadvantage. It should be sealed in its entirety.

15 3. Exhibit 17 to the Cashman Declaration is a copy of an excerpt of the transcript of  
16 the October 21, 2011 deposition of Daniele De Iuliis. Exhibit 17 contains trade secret  
17 information reflecting: Apple’s product design process, specifics regarding the iPad design  
18 project, and the inner workings of Apple’s industrial design group. This information is highly  
19 sensitive and could be used by Apple’s competitors to Apple’s disadvantage. Exhibit 17 should  
20 be partially sealed, and a proposed redacted version is attached as **Exhibit A**.

21 4. Exhibit 18 to the Cashman Declaration is a copy of an excerpt of the transcript of  
22 the November 4, 2011 deposition of Christopher Stringer. Exhibit 18 contains trade secret  
23 information reflecting: Apple’s product design process, specifics regarding the iPad design  
24 project, and the inner workings of Apple’s industrial design group. This information is highly  
25 sensitive and could be used by Apple’s competitors to Apple’s disadvantage. It should be sealed  
26 in its entirety. Exhibit 18 should be partially sealed, and a proposed redacted version is attached  
27 as **Exhibit B**.



