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

I am a member of the Bar of the State of California and a partner at Quinn Emanuel

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Urquhart & Sullivan, LLP, attorneys for Samsung Electronics Co., Ltd., Samsung Electronics

I, Anthony P. Alden, declare as follows:

America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung"). I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I

could and would testify competently thereto.

2. I have reviewed the Court's Order Denying Administrative Motions to File Under Seal (Re: Docket Nos. 769, 799, 822, 824, 845) (Dkt. No. 1105) (the "Order"). As a result of an administrative oversight, Samsung did not file the declarations in support of Apple's motions to file under seal referenced in the Order earlier.

3. On June 19, 2012, after reviewing the Order, I telephoned Richard Hung, counsel for Apple in this matter. I informed Mr. Hung that certain of the documents referenced in the Order contain highly confidential Samsung information, and that Samsung intended to file an emergency request to seal those documents. I asked Mr. Hung whether Apple would oppose such a request. Mr. Hung replied that he was not in a position to say whether Apple would agree to Samsung's request because his client contact is out of town and may not be available until the morning of June 20, 2012. Mr. Hung agreed that, if Samsung needed to file the emergency request that night, I could inform the Court of his response. I requested that Mr. Hung advise me as soon as he had spoken with his client. But, as of the time of the filing of this declaration, I have not received any further response from Mr. Hung regarding Samsung's request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 19, 2012, at Los Angeles, California.

/s/ Anthony P. Alden Anthony P. Alden

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