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

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
 18

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 23 ELECTRONICS AMERICA, INC., a New  
 York corporation; SAMSUNG  
 24 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,

25 Defendant.  
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF HANKIL KANG IN  
 SUPPORT OF APPLE'S  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS UNDER SEAL**

1 Pursuant to Civil L.R. 79-5(d), Defendants Samsung Electronics Co., Ltd., Samsung  
2 Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively  
3 “Samsung”) submit the appended declaration of Hankil Kang in support of Apple's Administrative  
4 Motion to File Documents Under Seal (Dkt. No. 1089), to establish that the following is sealable:

- 5 • Exhibit 10 to the Declaration of Mia Mazza in Support of Apple's Opening Design  
6 Patent Claim Construction Brief (“Mazza Declaration”).

7 **DECLARATION OF HANKIL KANG**

8 I, Hankil Kang, do hereby declare as follows:

9 1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this Declaration in  
10 support of Apple's Administrative Motions to File Documents Under Seal (Dkt. No. 1089). I have  
11 personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and  
12 would competently testify to such facts under oath.

13 2. Exhibit 10 to the Mazza Declaration consists of excerpts from the deposition  
14 transcripts of Samsung employee Jungmin Yeo. This document, which has been designated  
15 **HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY** under the Protective Order in this  
16 case, contains sensitive commercial information regarding cost considerations and other  
17 constraints that factor into the design and development process of Samsung products. This  
18 information is confidential and proprietary to Samsung, and could be used to its disadvantage by  
19 competitors if these documents were not filed under seal.

20 I declare under penalty of perjury that the forgoing is true and correct to the best of my  
21 knowledge. Executed in Suwon, South Korea on June 20, 2012.

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25 Hankil Kang