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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 Defendants.
 26

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF HANKIL KANG IN
 SUPPORT OF APPLE'S
 ADMINISTRATIVE MOTIONS TO FILE
 DOCUMENTS UNDER SEAL (DKT. NOS.
 925, 1013, 1020, AND 1022-1024)**

27
 28

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 declaration of Hankil Kang in Support of Apple’s Administrative Motions
4 to File Documents Under Seal (Dkt. Nos. 925, 1013, 1020, and 1022-1024), to establish that the
5 following documents, or portions thereof, are sealable:

- 6 • Exhibit Nos. 10, 17 and 22 to the Declaration of Mark D. Selwyn in Support of Apple's
7 Motion for Summary Judgment of Non-Infringement of U.S. Patent Number 7,362,867
8 and Invalidity of U.S. Patent Numbers 7,456,893 and 7,577,460 ("Selwyn
9 Declaration") (Dkt. No. 925);
- 10 • Exhibit Nos. 3, 4, and 10 to the Declaration of Karl Kramer in Support of Apple’s
11 Opposition to Samsung’s Motion for Summary Judgment (“Kramer Declaration”)
12 (Dkt. No. 1013);
- 13 • Exhibits C, D, L, M, N, O, and S to the Declaration of Michel Maharbiz, Ph.D. in
14 Support of Apple’s Opposition to Samsung’s Motion for Summary Judgment
15 (“Maharbiz Declaration”) (Dkt. No. 1013);
- 16 • Exhibit Nos. 22, 30, 36, 39, 43, 44, 70, 73 and 74 to the Declaration of Jason R.
17 Bartlett in Support of Apple’s Opposition to Samsung’s Motion for Summary
18 Judgment (“Bartlett Declaration”) (Dkt. No. 1020);
- 19 • Exhibit Nos. 31, 36, 37, 38, 67, 68, 70, 72 and 94 to the Declaration of Peter W.
20 Bressler in Support of Apple’s Opposition to Samsung’s Motion for Summary
21 Judgment (“Bressler Declaration”) (Dkt. No. 1022);
- 22 • Exhibit No. 1 to the Declaration of Dr. Russell S. Winer in Support of Apple’s
23 Opposition to Samsung’s Motion for Summary Judgment (“Apple’s Opp. to MSJ”)
24 (“Winer Declaration”) (Dkt. No. 1023);
- 25 • Exhibit Nos. 1 and 8 to the Declaration of Dr. Karan Singh, Ph.D. in Support of
26 Apple’s Opp. to MSJ (“Singh Declaration”) (Dkt. No. 1024); and

- The Declaration of Terry L. Musika in Support of Apple’s Opposition to Samsung's Motion for Summary Judgment (“Musika Declaration”) and Exhibits B, F, G, H, K, and L thereto (Dkt. No. 1024).

DECLARATION OF HANKIL KANG

I, Hankil Kang, do hereby declare as follows:

1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this Declaration in support of Apple’s Administrative Motions to File Documents Under Seal (Dkt. Nos. 925, 1013, 1020, 1022, 1023, and 1024). I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to them.

Docket No. 925

2. Exhibit No. 10 to the Selwyn Declaration is an excerpt from the Expert Report of J. Paul Dourish, Ph.D. Regarding Invalidity of the Asserted Claims of U.S. Patent No. 7,456,893, which is designated HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY under the Protective Order. The portions of this document that Samsung requests be sealed contain confidential information relating to the efforts of Samsung engineers to integrate certain technologies into a single portable electronic device. This information is confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal. The reasons why each portion of the excerpt should be sealed are explained in the table below and a proposed redacted version of the excerpt is attached as Exhibit 1.

3. Exhibit No. 17 to the Selwyn Declaration consists of excerpts from the expert report of Ramamirtham Sukumar, entitled "Results from A Survey Measuring Use and Valuation of Four Patented Features (Patented Features: 460,893, 711, 871) and A Survey of World Clock Patented Feature Usage (Patented Feature 055)." The portions of this document that Samsung requests be sealed contain confidential information relating to valuations of Samsung's patents and the technological features claimed by Samsung's patents. This information is confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal. The reasons why each portion of the excerpt should be sealed are explained in the table below and a proposed redacted version of the excerpt is attached as Exhibit 2.

1 4. Exhibit No. 22 to the Selwyn Declaration is an excerpt from the Expert Report of
2 Mani Srivastava, Ph.D. Regarding Invalidity of the Asserted Claim of U.S. Patent No. 7,577,460,
3 which is designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the
4 Protective Order. The portions of this document that Samsung requests be sealed contain
5 confidential information relating to the efforts of Samsung engineers to integrate certain
6 technologies into a single portable electronic device. This information is confidential and
7 proprietary to Samsung, and could be used to its disadvantage by competitors if it were not filed
8 under seal. The reasons why each portion of the excerpt should be sealed are explained in the
9 table below and a proposed redacted version of the excerpt is attached as Exhibit 3.

10 **Docket No. 1013**

11 5. Exhibit No. 3 to the Kramer Declaration is an excerpt from Samsung's
12 Supplemental Objections and Responses to Apple's Sixteenth Set of Interrogatories (No. 81),
13 which Samsung has designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under
14 the Protective Order. The portions of the excerpt that Samsung requests be sealed contain
15 sensitive information relating to the structure and operation of the touchscreen panels, touchscreen
16 controllers, and integrated circuits of the Samsung accused products. This information is
17 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it
18 were not filed under seal. The reasons why each portion of the excerpt should be sealed are
19 explained in the table below and a proposed redacted version of the excerpt is attached as Exhibit
20 4.

21 6. Exhibit No. 4 to the Kramer Declaration is an excerpt from Samsung's Second
22 Supplemental Objections and Responses to Apple's Sixteenth Set of Interrogatories (No. 81),
23 which Samsung has designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under
24 the Protective Order. The portions of the excerpt that Samsung requests be sealed contain
25 sensitive information relating to the structure and operation of the touchscreen panels, touchscreen
26 controllers, and integrated circuits of the Samsung accused products. This information is
27 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it
28 were not filed under seal. The reasons why each portion of the excerpt should be sealed are

1 explained in the table below and a proposed redacted version of the excerpt is attached as Exhibit
2 5.

3 7. Exhibit No. 10 to the Kramer Declaration is an excerpt from the Rebuttal Expert
4 Report of Stephen Gray Regarding Non-Infringement of Asserted Claims of U.S. Patent Nos.
5 7,844,915 and 7,864,163, which Samsung has designated HIGHLY CONFIDENTIAL-
6 ATTORNEYS' EYES ONLY under the Protective Order. The portions of the excerpt that
7 Samsung requests be sealed contain sensitive information relating to the operation of the
8 touchscreens of Samsung's accused products, including specific source code modules which
9 execute certain functions when the accused products receive user input. This information is
10 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it
11 were not filed under seal. The reasons why each portion of the excerpt should be sealed are
12 explained in the table below and a proposed redacted version of the excerpt is attached as Exhibit
13 6.

14 8. Exhibit C to the Maharbiz Declaration is a document produced by Samsung in this
15 litigation bearing Bates labels beginning SAMNDCA10903768, and with the designation
16 HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order. This
17 document contains highly confidential business information of a Samsung supplier, Atmel, Corp.
18 (“Atmel”), including detailed information concerning the structure and operation of the
19 touchscreens of Samsung's accused products. The information contained in this document is
20 confidential and proprietary, and could be used by competitors to the disadvantage of Samsung
21 and Atmel if it were not filed under seal. The reasons why this document should be filed under
22 seal are explained in the table below.

23 9. Exhibit D to the Maharbiz Declaration is a document produced by third-party
24 Atmel in this litigation bearing Bates labels beginning ATMEL-SAMSUNG00000287, and with
25 the designation HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective
26 Order. It contains detailed information concerning the structure and operation of the touchscreens
27 of Samsung's accused products. The information contained in this document is confidential and
28 proprietary, and could be used by competitors to the disadvantage of Samsung and Atmel if it

1 were not filed under seal. The reasons why this document should be filed under seal are explained
2 in the table below.

3 10. Exhibit L to the Maharbiz Declaration is a document produced by Samsung in this
4 litigation bearing Bates labels beginning SAMNDCA10890091, and with the designation
5 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
6 portions of the document that Samsung requests be sealed contain highly sensitive information
7 concerning Samsung's strategies in expanding the market for touchscreen devices, as well as
8 Samsung's actual and projected sales of devices with capacitive and resistive touchscreen
9 panels. The information contained in this document is confidential and proprietary to Samsung,
10 and could be used to its disadvantage by competitors if it were not filed under seal. The reasons
11 why each portion of the document should be sealed are explained in the table below and a
12 proposed redacted version of the document is attached as Exhibit 7.

13 11. Exhibit M to the Maharbiz Declaration is a document produced by Samsung in this
14 litigation bearing Bates labels beginning SAMNDCA10903827, and with the designation
15 HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the Protective Order. This
16 document contains highly confidential business information of Atmel, including detailed
17 information concerning the structure and operation of the touchscreens of Samsung's accused
18 products. The information contained in this document is confidential and proprietary, and could
19 be used by competitors to the disadvantage of Samsung and Atmel if it were not filed under seal.
20 The reasons why this document should be filed under seal are explained in the table below.

21 12. Exhibit N to the Maharbiz Declaration is a document produced by Samsung in this
22 litigation bearing Bates labels beginning SAMNDCA10765465, and with the designation
23 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. This
24 document contains sensitive information concerning the touchscreen panels manufactured by
25 Atmel and incorporated into certain Samsung products, including information relating to the
26 structure and operation of those touchscreen panels, advantages over competitors' products, and
27 Atmel's manufacturing and quality control processes. The information contained in this document
28 is confidential and proprietary, and could be used by competitors to the disadvantage of Samsung

1 and Atmel if it were not filed under seal. The reasons why this document should be filed under
2 seal are explained in the table below.

3 13. Exhibit O to the Maharbiz Declaration is a document produced by Samsung in this
4 litigation bearing Bates labels beginning SAMNDCA10765465, and with the designation
5 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
6 portions of the document that Samsung requests be sealed contain highly sensitive financial data
7 relating to Samsung's material costs and internal analysis of component costs in the marketplace.
8 This information is confidential and proprietary to Samsung, and could be used to its disadvantage
9 by competitors if it were not filed under seal. The reasons why each portion of the document
10 should be sealed are explained in the table below and a proposed redacted version of the document
11 is attached as Exhibit 8.

12 14. Exhibit S to the Maharbiz Declaration is a document produced by Samsung in this
13 litigation bearing Bates labels beginning SAMNDCA10765465, and with the designation
14 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
15 portions of the document that Samsung requests be sealed contain confidential, non-public
16 information concerning the technical specifications of tablet products, including unreleased
17 products. This information is confidential and proprietary to Samsung, and could be used to its
18 disadvantage by competitors if it were not filed under seal. The reasons why each portion of the
19 document should be sealed are explained in the table below and a proposed redacted version of the
20 document is attached as Exhibit 9.

21 **Docket No. 1020**

22 15. Exhibit No. 22 to the Bartlett Declaration is a document produced by Samsung in
23 this litigation bearing Bates labels beginning SAMNDCA00515899, and with the designation
24 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
25 portions of the document that Samsung requests be sealed contain confidential information
26 concerning the design and development process that led to the Samsung accused products, and
27 non-public financial information, including specific information about design, marketing, and
28 pricing strategy. This information is confidential and proprietary to Samsung, and could be used

1 to its disadvantage by competitors if it were not filed under seal. The reasons why each portion of
2 the document should be sealed are explained in the table below and a proposed redacted version of
3 the document is attached as Exhibit 10.

4 16. Exhibit No. 30 to the Bartlett Declaration consists of excerpts from the May 4,
5 2012 deposition transcript of Stephen Gray. Samsung has designated the transcript HIGHLY
6 CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The portions of the
7 excerpts that Samsung requests be sealed contain highly sensitive information relating to the
8 operation of the touchscreens of Samsung's accused products, including specific source code
9 modules which execute certain functions when the accused products receive user input. This
10 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
11 competitors if the excerpts were not filed under seal. The reasons why each portion of the
12 excerpts should be sealed are explained in the table below and a proposed redacted version of the
13 excerpts is attached as Exhibit 11.

14 17. Exhibit No. 36 to the Bartlett Declaration consists of excerpts from the February
15 29, 2012 deposition transcript of Seog Guen Kim, taken in ITC Investigation No. 337-TA-796
16 ("796 Investigation"). Samsung has designated the transcript CONFIDENTIAL BUSINESS
17 INFORMATION under the protective order in place in the 796 Investigation. The portions of the
18 excerpts that Samsung requests be sealed contain confidential information concerning Samsung
19 products which have not yet been released in the United States, as well as design guidelines which
20 Samsung currently applies in the process of designing products which have not yet been released
21 to the public. This information is confidential and proprietary to Samsung, and could be used to
22 its disadvantage by competitors if the excerpts were not filed under seal. The reasons why each
23 portion of the excerpts should be sealed are explained in the table below and a proposed redacted
24 version of the excerpts is attached as Exhibit 12.

25 18. Exhibit No. 39 to the Bartlett Declaration consists of excerpts from the March 2,
26 2012 deposition transcript of Seog Guen Kim, taken in the 796 Investigation. Samsung has
27 designated the transcript CONFIDENTIAL BUSINESS INFORMATION under the protective
28 order in place in the 796 Investigation. The portions of the excerpts that Samsung requests be

1 sealed contain confidential information concerning products which have not yet been released in
2 the United States, as well as design guidelines which Samsung currently applies in the process of
3 designing products which have not yet been released to the public. This information is
4 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if
5 the excerpts were not filed under seal. The reasons why each portion of the excerpts should be
6 sealed are explained in the table below and a proposed redacted version of the excerpts is attached
7 as Exhibit 13.

8 19. Exhibit No. 43 to the Bartlett Declaration consists of excerpts from the January 11,
9 2012 deposition transcript of Bo-Ra Kim. Samsung has designated the transcript HIGHLY
10 CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The portions of the
11 excerpts that Samsung requests be sealed contain confidential information regarding alternative
12 designs considered by Samsung during the design and product planning processes leading to the
13 release of Samsung's Infuse 4G product. Samsung has not implemented these designs in a
14 commercially released product, but may do so in the future. This information is therefore
15 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if
16 the excerpts were not filed under seal. The reasons why each portion of the excerpts should be
17 sealed are explained in the table below and a proposed redacted version of the excerpts is attached
18 as Exhibit 14.

19 20. Exhibit No. 44 to the Bartlett Declaration consists of excerpts from the February 8,
20 2012 deposition transcript of Hangil Song. Samsung has designated the transcript HIGHLY
21 CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The portions of the
22 excerpts that Samsung requests be sealed contain confidential information concerning alternative
23 designs considered by Samsung during the design and development process leading up to the
24 release of Samsung's Galaxy Prevail product. Samsung has not yet implemented these alternative
25 designs into released products, but may do so in the future. This information is therefore
26 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if
27 the excerpts were not filed under seal. The reasons why each portion of the excerpts should be
28

1 sealed are explained in the table below and a proposed redacted version of the excerpts is attached
2 as Exhibit 15.

3 21. Exhibit No. 70 to the Bartlett Declaration is a document produced by Samsung in
4 this litigation bearing Bates labels beginning SAMNDCA00201771, and with the designation
5 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
6 document contains detailed information concerning Samsung's review of numerous features or
7 functions of the Galaxy Tab 10.1, including specific source code and software applications, as
8 well as analysis and suggestions for improving those features and alternative ways of executing
9 certain functions. This information is confidential and proprietary to Samsung, and could be used
10 to its disadvantage by competitors if it were not filed under seal. The reasons why this document
11 should be filed under seal are included in the table below.

12 22. Exhibit Nos. 73 and 74 to the Bartlett Declaration are documents produced by
13 Samsung in this litigation bearing Bates labels beginning SAMNDCA10851706 and
14 SAMNDCA10850604, respectively, and with the designation HIGHLY CONFIDENTIAL-
15 ATTORNEYS' EYES ONLY under the Protective Order. The portions of these documents that
16 Samsung requests be sealed contain confidential information concerning strategies and proposals
17 regarding the design and development of technical features of Samsung's products, as well as the
18 specific source code files and algorithms used to implement those features. This information is
19 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if
20 these documents were not filed under seal. The reasons why each portion of each document
21 should be sealed are explained in the table below and proposed redacted versions of these
22 documents are attached as Exhibits 16 and 17.

23 **Docket No. 1022**

24 23. Exhibit No. 31 to the Bressler Declaration is a document produced by Samsung in
25 this litigation bearing Bates labels beginning SAMNDCA10809734, and with the designation
26 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
27 portions of the document that Samsung requests be sealed contain confidential information
28 concerning Samsung's design philosophy, guidelines and strategies for implementing that

1 philosophy in smartphone products, as well as numerous designs which have not yet been
2 implemented in commercially released products. This information is confidential and proprietary
3 to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal.
4 The reasons why each portion of this document should be sealed are explained in the table below
5 and a proposed redacted version of this document is attached as Exhibit 18.

6 24. Exhibit No. 36 to the Bressler Declaration is a document produced by Samsung in
7 this litigation bearing Bates labels beginning SAMNDCA10131459, and with the designation
8 **HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY** under the Protective Order. The
9 portions of the document that Samsung requests be sealed contain confidential information
10 regarding alternative designs considered by Samsung during the design and product planning
11 processes leading to the release of Samsung's Sidekick product. Samsung has not implemented
12 these designs in a commercially released product, but may do so in the future. This information is
13 therefore confidential and proprietary to Samsung, and could be used to its disadvantage by
14 competitors if it were not filed under seal. The reasons why each portion of this document should
15 be sealed are explained in the table below and a proposed redacted version of this document is
16 attached as Exhibit 19.

17 25. Exhibit No. 37 to the Bressler Declaration is a document produced by Samsung in
18 this litigation bearing Bates labels beginning SAMNDCA00530405, and with the designation
19 **HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY** under the Protective Order. The
20 portions of the document that Samsung requests be sealed contain confidential information
21 regarding the design and development process and non-public financial information, including
22 Samsung's design strategy, past performance, future projections, and specific pricing strategy.
23 This information is confidential and proprietary to Samsung, and could be used to its disadvantage
24 by competitors if it were not filed under seal. The reasons why each portion of this document
25 should be sealed are explained in the table below and a proposed redacted version of this
26 document is attached as Exhibit 20.

27 26. Exhibit No. 38 to the Bressler Declaration is a document produced by Samsung in
28 the 796 Investigation bearing Bates labels beginning S-ITC-007849424, and with the designation

1 CONFIDENTIAL BUSINESS INFORMATION pursuant to the protective order in place in the
2 796 Investigation. The portions of the document that Samsung requests be sealed contain highly
3 sensitive financial data concerning Samsung's Galaxy S product, including actual and projected
4 sales volumes and profits, as well as Samsung's marketing strategy for the Galaxy S. This
5 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
6 competitors if it were not filed under seal. The reasons why each portion of this document should
7 be sealed are explained in the table below and a proposed redacted version of this document is
8 attached as Exhibit 21.

9 27. Exhibit Nos. 67 and 68 to the Bressler Declaration are documents produced by
10 Samsung in this litigation with the designation HIGHLY CONFIDENTIAL – ATTORNEYS'
11 EYES ONLY under the Protective Order. The documents consist of images of alternative designs
12 considered by Samsung during the design and development process leading to the release of
13 certain of the accused products. Samsung has not yet implemented these designs in released
14 products, but may do so in the future. The information conveyed by these images is therefore
15 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if
16 these documents were not filed under seal. The reasons why these documents should be sealed are
17 explained in the table below.

18 28. Exhibit No. 70 to the Bressler Declaration is a document produced by Samsung in
19 this litigation bearing Bates labels beginning SAMNDCA10131459, and with the designation
20 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. This
21 document is a duplicate of Exhibit No. 36 to the Bressler Declaration and should therefore be
22 partially sealed for the same reasons. (*See* ¶ 24, *supra*, Ex. 19).

23 29. Exhibit No. 72 to the Bressler Declaration is a document produced by Samsung in
24 this litigation bearing Bates labels beginning SAMNDCA10808682, and with the designation
25 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
26 portions of the document that Samsung requests be sealed contain confidential information
27 regarding the design and development process and non-public financial information, including
28 Samsung's design strategy, past performance, future projections, and specific pricing strategy.

1 This information is confidential and proprietary to Samsung, and could be used to its disadvantage
2 by competitors if it were not filed under seal. The reasons why each portion of this document
3 should be sealed are explained in the table below and a proposed redacted version of this
4 document is attached as Exhibit 22.

5 30. Exhibit No. 94 to the Bressler Declaration consists of images of alternative designs
6 considered by Samsung during the design and development process leading to the release of
7 certain of the accused Samsung products. Samsung has not yet implemented these designs in
8 released products, but may do so in the future. The information conveyed by these images, which
9 Samsung has designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the
10 Protective Order, is therefore confidential and proprietary to Samsung, and could be used to its
11 disadvantage by competitors if it were not filed under seal. The reasons why this document should
12 be sealed are explained in the table below.

13 **Docket No. 1023**

14 31. Exhibit No. 1 to the Winer Declaration is the Expert Report of Russell S. Winer.
15 This document quotes, references, or describes documents produced by Samsung in this litigation
16 with the designation HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY under the
17 Protective Order. The portions of the document that Samsung requests be sealed reveal the
18 contents of consumer studies and market research conducted by or on behalf of Samsung, as well
19 as executive-level meetings relating to the design and development of Samsung's products. This
20 information is confidential and proprietary to Samsung, and could be used by competitors to the
21 detriment of Samsung if this document is not filed under seal. The reasons why each portion of
22 this document should be sealed are explained in the table below and a proposed redacted version
23 of this document is attached as Exhibit 23.

24 **Docket No. 1024**

25 32. Exhibit No. 1 to the Singh Declaration is the Expert Report of Karan Singh, Ph.D.
26 Regarding Infringement of U.S. Patent Nos. 7,864,163 and 7,853,891, which Samsung has
27 designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order.
28 The portions of the document that Samsung requests be sealed contain highly sensitive

1 information relating to the operation of the touchscreens and graphical user interfaces of
2 Samsung's accused products, including specific source code modules which execute certain
3 functions when the accused products receive user input. This information is confidential and
4 proprietary to Samsung, and could be used to its disadvantage by competitors if it were not filed
5 under seal. The reasons why each portion of this document should be sealed are explained in the
6 table below and a proposed redacted version of this document is attached as Exhibit 24.

7 33. Exhibit No. 8 to the Singh Declaration is an infringement claim chart for U.S.
8 Patent No. 7,844,915 against the Galaxy Tab 10.1 and has been designated HIGHLY
9 CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The portions of the
10 document that Samsung requests be sealed contain highly sensitive information relating to the
11 operation of the touchscreens and graphical user interfaces of Samsung's Galaxy Tab 10.1,
12 including specific source code modules which execute certain functions when the product receives
13 user input. This information is confidential and proprietary to Samsung, and could be used to its
14 disadvantage by competitors if it were not filed under seal. The reasons why each portion of this
15 document should be sealed are explained in the table below and a proposed redacted version of
16 this document is attached as Exhibit 25.

17 34. Exhibit B to the Musika Declaration consists of tables and notes prepared by
18 Apple's damages expert based on documents produced by Samsung in this litigation with the
19 designation HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective
20 Order. The tables and notes contain Samsung's highly sensitive, non-public financial information,
21 including specific information about the number of Samsung accused products sold and the market
22 shares of the same. This information is confidential and proprietary to Samsung, and could be
23 used to its disadvantage by competitors if it were not filed under seal. The reasons why the
24 entirety of this document should be filed under seal are explained in the table below.

25 35. Exhibit F to the Musika Declaration consists of a table and notes prepared by
26 Apple's damages expert based on documents produced by Samsung in this litigation with the
27 designation HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective
28 Order. The table and notes contain Samsung's highly sensitive, non-public financial information,

1 including specific information about the number of Samsung accused products sold, Samsung's
2 revenue, cost of goods sold, and profits. This information is confidential and proprietary to
3 Samsung, and could be used to its disadvantage by competitors if it were not filed under seal. The
4 reasons why the entirety of this document should be filed under seal are explained in the table
5 below.

6 36. Exhibit G to the Musika Declaration consists of a table and notes prepared by
7 Apple's damages expert based on documents produced by Samsung in this litigation with the
8 designation HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective
9 Order. The table and notes contain Samsung's highly sensitive, non-public financial information,
10 including specific information about the number of Samsung accused products sold, Samsung's
11 revenue, cost of goods sold, and profits. This information is confidential and proprietary to
12 Samsung, and could be used to its disadvantage by competitors if it were not filed under seal. The
13 reasons why the entirety of this document should be filed under seal are explained in the table
14 below.

15 37. Exhibit H to the Musika Declaration consists of tables prepared by Apple's expert
16 based, in part, on documents produced by Samsung in this litigation with the designation
17 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The tables
18 contain confidential information about the design and development process regarding certain
19 Samsung accused products. This information is confidential and proprietary to Samsung, and
20 could be used to its disadvantage by competitors if it were not filed under seal. The reasons why
21 the entirety of this document should be filed under seal are explained in the table below.

22 38. Exhibit K to the Musika Declaration consists of excerpts of a document produced
23 by Samsung in this litigation bearing Bates labels beginning SAMNDCA11104115, and with the
24 designation HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective
25 Order. The portions of the document that Samsung requests be sealed contain confidential
26 information regarding the development of certain Samsung accused products, including specific
27 information about features strategy. This information is confidential and proprietary to Samsung,
28 and could be used to its disadvantage by competitors if it were not filed under seal. The reasons

1 why each portion of this document should be sealed are explained in the table below and a
2 proposed redacted version of this document is attached as Exhibit 26.

3 39. Exhibit L to the Musika Declaration is a document produced by Samsung in this
4 litigation bearing Bates labels beginning SAMNDCA00525347, and with the designation
5 HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the Protective Order. The
6 portions of this document that Samsung requests be sealed contain confidential information
7 concerning strategies for the design and development of technical features included in certain
8 Samsung products. This information is confidential and proprietary to Samsung, and could be
9 used to its disadvantage by competitors if these documents were not filed under seal. The reasons
10 why each portion of this document should be sealed are explained in the table below and a
11 proposed redacted version of this document is attached as Exhibit 27.

12 40. The limited portions of the Musika Declaration that Samsung requests be sealed
13 discuss the information described in paragraphs 35, 36, 38, and 39, above. This information is
14 confidential and proprietary to Samsung, and the Declaration should be sealed for the same
15 reasons as described above. A proposed redacted version of the Declaration is attached as Exhibit
16 28.

17 41. The following table describes the reasons why each portion of each document
18 Samsung requests be sealed should be sealed.

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Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
925	Selwyn Decl., Ex. 10	p. 56	Confidential Samsung information relating to the efforts of Samsung engineers to integrate certain technologies into a single portable electronic device.
	Selwyn Decl., Ex. 17	pp. 4-9	Confidential Samsung information relating to valuations of Samsung's patented technologies.

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Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Selwyn Decl., Ex. 22	p. 92	Confidential Samsung information relating to the efforts of Samsung engineers to integrate certain technologies into a single portable electronic device.
1013	Kramer Decl., Ex. 3	p. 6	Confidential Samsung information regarding the structure and operation of the touchscreen panels, touchscreen controllers, and integrated circuits of certain of the Samsung accused products.
	Kramer Decl., Ex. 4	pp. 6-8	Confidential Samsung information regarding the structure and operation of the touchscreen panels, touchscreen controllers, and integrated circuits of certain of the Samsung accused products.
	Kramer Decl., Ex. 10	pp. 9, 14-16	Confidential Samsung information regarding operation of the touchscreens of certain Samsung accused products, including specific source code modules which execute certain functions when the accused products receive user input.
	Maharbiz Decl., Ex. C	Bates Nos. -768-83	Confidential Samsung information regarding structure and operation of the touchscreens of certain Samsung accused products.
	Maharbiz Decl., Ex. D	Bates Nos. -286-301	Confidential Samsung information regarding the structure and operation of the touchscreens of certain Samsung accused products.
	Maharbiz Decl., Ex. L	Bates No. -095-96, -098	Confidential Samsung information regarding Samsung's strategies in expanding the market for touchscreen devices, as well as Samsung's actual and projected sales of devices with capacitive and resistive touchscreen panels.
	Maharbiz Decl., Ex. M	Bates Nos. -827-70	Confidential Samsung information regarding the structure, operation and capabilities of the touchscreen panels manufactured by Atmel and incorporated into certain Samsung products, as well as the circuitry and controller chips comprising those touchscreen panels.

Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Maharbiz Decl., Ex. N	Bates Nos. -465-66	Confidential Samsung information regarding the touchscreen panels manufactured by Atmel and incorporated into certain Samsung products, including information relating to the structure and operation of those touchscreen panels, advantages over competitors' products, and Atmel's manufacturing and quality control processes.
	Maharbiz Decl., Ex. O	Bates Nos. -873, -883	Confidential Samsung financial data relating to Samsung's materials costs and internal analysis of component costs in the marketplace.
	Maharbiz Decl., Ex. S	Bates Nos. -931, -932, -934	Confidential Samsung information regarding the non-public technical specifications of tablet products, including unreleased products.
1020	Bartlett Decl., Ex. 22	Bates Nos. -899-902, -904-09	Confidential Samsung information regarding specific design, pricing, and marketing strategy.
	Bartlett Decl., Ex. 30	pp. 38-53	Confidential Samsung information regarding the operation of the touchscreens of certain Samsung accused products, including specific source code modules which execute certain functions when the accused products receive user input.
	Bartlett Decl., Ex. 36	pp. 76-81, 87-90	Confidential Samsung information regarding products which have not yet been released in the United States, as well as design guidelines which Samsung currently applies in the process of designing products which have not yet been released to the public.
	Bartlett Decl., Ex. 39	pp. 151-52, 169-70	Confidential Samsung information regarding products which have not yet been released in the United States, as well as design guidelines which Samsung currently applies in the process of designing products which have not yet been released to the public.
	Bartlett Decl., Ex. 43	pp. 89-90	Confidential Samsung information regarding alternative designs considered by Samsung during the design and product planning processes leading to the release of Samsung's Infuse 4G product.


Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Bartlett Decl., Ex. 44	p. 80	Confidential Samsung information regarding alternative designs considered by Samsung during the design and development process leading up to the release of Samsung's Galaxy Prevail product.
	Bartlett Decl., Ex. 70	Bates Nos. -771-80	Confidential Samsung information regarding Samsung's review of numerous features or functions of the Galaxy Tab 10.1, including specific source code and software applications, as well as analysis and suggestions for improving those features and alternative ways of executing certain functions.
	Bartlett Decl., Ex. 73	Bates Nos. -706-07	Confidential Samsung information regarding strategies and proposals regarding the design and development of technical features of certain Samsung products, as well as the specific source code files and algorithms used to implement those features.
	Bartlett Decl., Ex. 74	Bates Nos. -604-06	Confidential Samsung information regarding strategies and proposals regarding the design and development of technical features of certain Samsung products, as well as the specific source code files and algorithms used to implement those features.
1022	Bressler Decl., Ex. 31	Bates Nos. -734, -737-79, -783, -788-89, -790, -796, -799, -800, -803, -810-12, -814-21, -823-28, -834-37, -839, -841, -843-45, -847, -851-58, -859-69	Confidential Samsung information regarding Samsung's design philosophy, guidelines and strategies for implementing that philosophy in smartphone products, as well as numerous designs which have not yet been implemented in commercially released products.

Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Bressler Decl., Ex. 36	Bates Nos. -460, -462, -470-73, -475, -476-97, -499-525, -527-60	Confidential Samsung information regarding alternative designs considered by Samsung during the design and product planning processes leading to the release of Samsung's Sidekick product.
	Bressler Decl., Ex. 37	Bates Nos. -409-13, -416-18, -420, -424-32, -434, -440-41, -443, -489	Confidential Samsung information regarding design strategy, past financial performance, future financial projections, and specific pricing strategy.
	Bressler Decl., Ex. 38	Bates Nos. -464-67	Confidential Samsung information regarding Samsung's Galaxy S product, including actual and projected sales volumes and profits, as well as Samsung's marketing strategy for the Galaxy S.
	Bressler Decl., Ex. 67	Seal in entirety (document not Bates labeled)	Confidential Samsung information regarding alternative designs considered by Samsung during the design and development process leading to the release of certain Samsung accused products.
	Bressler Decl., Ex. 68	Seal in entirety (document not Bates labeled)	Confidential Samsung information regarding alternative designs considered by Samsung during the design and development process leading to the release of certain Samsung accused products.
	Bressler Decl., Ex. 70	Bates Nos. -460, -462, -470-73, -475, -476-97, -499-525, -527-60	Confidential Samsung information regarding alternative designs considered by Samsung during the design and product planning processes leading to the release of Samsung's Sidekick product.

Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Bressler Decl., Ex. 72	Bates Nos. -689, -698, -700-04, -707-08, -710, -712-14, -716-23, -725-27, -729-35, -737-40, -742-53, -755-58	Confidential Samsung information regarding alternative designs, design strategy, and non-public financial information, including past performance, future projections, and pricing strategy.
	Bressler Decl., Ex. 94	Seal in entirety (document not Bates labeled)	Confidential Samsung information regarding alternative designs considered by Samsung during the design and development process leading to the release of certain Samsung accused products.
1023	Winer Decl., Ex. 1	pp. 48, 53-54, 58, 60-64, 66-67, 73	Confidential Samsung information regarding consumer studies and market research conducted by or on behalf of Samsung, as well as executive-level meetings relating to the design and development of Samsung's products.
1024	Singh Decl., Ex. 1	pp. 85-86, 88-89, 91-99, 103-04, 108-10, 121-22	Confidential Samsung information regarding the operation of the touchscreens and graphical user interfaces of certain Samsung accused products, including specific source code modules which execute certain functions when the accused products receive user input.
	Singh Decl., Ex. 8	pp. 2-10, 12, 16, 25	Confidential Samsung information regarding the operation of the touchscreens and graphical user interfaces of certain Samsung accused products, including specific source code modules which execute certain functions when the accused products receive user input.
	Musika Decl., Ex. B	Seal in entirety (document not Bates labeled)	Highly confidential non-public Samsung financial data, including specific information regarding units of products sold and market share.

Dkt. No.	Document	Pages with Redactions	Reasons for Sealing
	Musika Decl., Ex. F	Seal in entirety (document not Bates labeled)	Highly confidential non-public Samsung financial data, including specific information regarding units of products sold, revenue, cost of goods sold, and profits.
	Musika Decl., Ex. G	Seal in entirety (document not Bates labeled)	Highly confidential non-public Samsung financial data, including specific information regarding units of products sold, revenue, cost of goods sold, and profits.
	Musika Decl., Ex. H	Seal in entirety (document not Bates labeled)	Confidential Samsung information regarding the design and development process for certain accused Samsung products.
	Musika Decl., Ex. K	Bates No. -138	Confidential Samsung information regarding the development of certain Samsung accused products, including specific information about features strategy.
	Musika Decl., Ex. L	Bates Nos. -347-48	Confidential Samsung information regarding the design and development of technical features included in certain Samsung accused products.
	Musika Decl.	pp. 6-7	Confidential Samsung information regarding confidential, non-public financial information and information regarding the development of features.

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this 27th day of June, 2012, in Suwon, South Korea.



Hankil Kang