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11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 APPLE INC., a California corporation,
 17
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 22 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 23 Defendants.

Case No. 11-cv-01846-LHK
**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. 1132, 1139, and 1147) pursuant
4 to Local Rules 7-11 and 79-5. I have personal knowledge of the matters set forth below. If called
5 as a witness I could and would competently testify as follows.

6 2. Samsung’s Motion for Leave to Seek Reconsideration of the Court’s June 25, 2012
7 Order (“Motion for Reconsideration”) and Exhibits 1, 3, 10, and 12-14 to the Declaration of
8 Thomas Watson in Support of the Motion for Reconsideration (“Watson Declaration”) contain
9 Apple-confidential information. As explained in Samsung’s Motion to File Under Seal (Dkt. No.
10 1132), the confidentiality of this information was already addressed in the Court’s June 4, 2012
11 Order Granting-in-Part, Denying-in-Part Motions to Seal (Dkt. No. 1034), which held that the
12 confidential documents at issue in Samsung’s Motion to Stay were properly filed under seal.
13 Apple had supported the confidentiality of the Apple-confidential information in these exhibits in
14 a declaration filed on June 4, 2012 (Dkt. No. 1031).

15 3. Apple does not maintain a claim of confidentiality on Exhibit 20 to the Watson
16 Declaration.

17 4. Apple does not maintain a claim of confidentiality on Samsung’s Opposition to
18 Apple’s Claim Construction Brief or Exhibit 5 to the Declaration of Adam Cashman in Support of
19 Samsung’s Opposition to Apple’s Claim Construction Brief.

20 5. Samsung’s Motion to Stay and Suspend the June 26, 2012 Preliminary Injunction
21 Pending Appeal Or, Alternatively, Pending Decision by Federal Circuit on Stay Pending Appeal
22 (“Motion to Stay”) contains Apple-confidential information. As explained in Samsung’s Motion
23 to File Under Seal (Dkt. No. 1147), the confidentiality of this information was already addressed
24 in the Court’s June 4, 2012 Order Granting-in-Part, Denying-in-Part Motions to Seal (Dkt. No.
25 1034), which held that the confidential documents at issue in Samsung’s Motion to Stay were
26 properly filed under seal. Apple had supported the confidentiality of the Apple-confidential
27 information in these exhibits in a declaration filed on June 4, 2012 (Dkt. No. 1031).

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed this 3rd day of July, 2012, in Cupertino, California.

/s/ Cyndi Wheeler
Cyndi Wheeler

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ATTESTATION OF E-FILED SIGNATURE

I, Jason R. Bartlett, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Cyndi Wheeler has concurred in this filing.

Dated: July 3, 2012

By: /s/ Jason R. Bartlett
Jason R. Bartlett