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

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,
 19 Plaintiff,
 20 vs.
 21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF BILL TRAC IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Bill Trac, declare:

2 1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
4 Telecommunications America, LLC (collectively, "Samsung"). I submit this Declaration in
5 support of Samsung's Administrative Motion to File Documents Under Seal. I have personal
6 knowledge of the facts set forth in this Declaration and, if called as a witness, could and would
7 competently testify to them.

8 2. The requested relief is necessary to protect the confidentiality of information
9 contained in the following documents:

- 10 a. The confidential, unredacted version of Samsung's Reply in Support of
11 Opening Memorandum Regarding Claim Construction; and
12 b. Exhibits 1-3 to the Declaration of Katharine Barach in Support of
13 Samsung's Reply in Support of Opening Memorandum Regarding Claim
14 Construction ("Barach Declaration").

15 3. Exhibit 1 to the Barach Declaration consists of excerpts from the October 25, 2011
16 deposition of Quin Hoellwarth. Apple has designated this testimony HIGHLY
17 CONFIDENTIAL – ATTORNEY EYES ONLY under the protective order. To the extent that
18 this document contains Apple confidential information, Samsung trusts that Apple will file the
19 declaration required by Civ. L. R. 79-5(d) establishing that the information therein as sealable.

20 4. Exhibit 2 to the Barach Declaration consists of excerpts from the October 27, 2011
21 deposition of Daniel Coster. Apple has designated this testimony HIGHLY CONFIDENTIAL –
22 ATTORNEY EYES ONLY under the protective order. To the extent that this document contains
23 Apple confidential information, Samsung trusts that Apple will file the declaration required by
24 Civ. L. R. 79-5(d) establishing that the information therein as sealable.

25 5. Exhibit 3 to the Barach Declaration consists of excerpts from the November 8,
26 2011 deposition of Douglas Satzger. Apple has designated this testimony HIGHLY
27 CONFIDENTIAL – ATTORNEY EYES ONLY under the protective order. To the extent that

1 this document contains Apple confidential information, Samsung trusts that Apple will file the
2 declaration required by Civ. L. R. 79-5(d) establishing that the information therein as sealable.

3

4 I declare under penalty of perjury that the foregoing is true and correct. Executed in
5 Redwood Shores, California on July 3, 2012.

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/s/ Bill Trac

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Bill Trac

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