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 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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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 (PSG)

**DECLARATION OF BILL TRAC 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 Declaration of Bill Trac in Support of Apple’s Administrative Motion to
4 File Documents Under Seal (Dkt. No. 1140), to establish that portions of the following document
5 are sealable:

- 6 • The Declaration of Peter W. Bressler, FIDSA, in Support of Apple’s Response to
7 Samsung’s Opening Memorandum Regarding Design Patent Claim Construction
8 (“Bressler Declaration”).

9 **DECLARATION OF BILL TRAC**

10 I, Bill Trac, do hereby declare as follows:

11 1. I am an associate at Quinn Emanuel Urquhart & Sullivan, LLP, counsel for
12 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
13 Telecommunications America, LLC (collectively, “Samsung”). I submit this Declaration in
14 support of Apple’s Administrative Motion to File Documents Under Seal Regarding Apple’s
15 Opposition to Samsung’s Design Claim Construction (Dkt. No. 1140). I have personal
16 knowledge of the facts set forth in this Declaration and, if called as a witness, could and would
17 competently testify to them.

18 2. The Bressler Declaration contains discussion regarding alternative designs
19 considered by Samsung during the design and development process leading to the release of
20 certain of the accused Samsung products. Samsung has not yet implemented these designs in
21 released products, but may do so in the future. The information conveyed by the discussion of
22 these images, which Samsung has designated HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES
23 ONLY under the Protective Order, is therefore confidential and proprietary to Samsung, and could
24 be used to its disadvantage by competitors if it were not filed under seal. A proposed redacted
25 version of the Bressler Declaration is attached as Exhibit 1.

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I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this 3rd day of July, 2012, in Redwood Shores, California.

/s/ Bill Trac
Bill Trac

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General Order 45 Attestation

I, Victoria F. Maroulis, 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 Bill Trac has concurred in this filing.

/s/ Victoria Maroulis