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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.
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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. Unless otherwise
6 indicated, I have personal knowledge of the facts set forth in this declaration and, if called upon as
7 a witness, I could and would testify as follows.

8 2. The requested relief is necessary to protect the confidentiality of information
9 discussed in Samsung's Claim Construction Brief ("Brief") and Exhibits 2, 4, 6 and 9-14 to the
10 Declaration of Patrick Schmidt in Support of Samsung's Claim Construction Brief ("Schmidt
11 Declaration").

12 3. Both the Brief and the Schmidt Declaration include discussion and excerpts from
13 documents, reports, and deposition transcripts that Apple has designated HIGHLY
14 CONFIDENTIAL – ATTORNEY'S EYES ONLY. Samsung expects that pursuant to Local
15 Rule 79-5(d), Apple will file a declaration under Local Rule 79-5(d) establishing good cause for
16 filing these confidential materials under seal.

17
18 I declare under penalty of perjury that the foregoing is true and correct. Executed in
19 Redwood Shores, California on July 5, 2012.

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21 /s/ Bill Trac
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/s/ Victoria Maroulis