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 11 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

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

16
 17 APPLE INC., a California corporation,
 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.
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Case No. 11-cv-01846-LHK (PSG)
**DECLARATION OF CYNDI WHEELER
 IN SUPPORT OF APPLE'S
 ADMINISTRATIVE MOTIONS TO FILE
 DOCUMENTS UNDER SEAL RE
 APPLE'S MOTIONS IN LIMINE**

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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 Apple’s Administrative Motion to File Under Seal pursuant to Local Rules 7-11 and 79-5. I have
4 personal knowledge of the matters set forth below. If called as a witness I could and would
5 competently testify as follows.

6 2. Apple’s Motion in Limine contains information concerning its non-public product
7 design and development process. This information is highly sensitive and could be used by
8 Apple’s competitors to Apple’s disadvantage, and thus Apple’s Motions in Limine should be
9 partially sealed.

10 3. Exhibit 10 to the Declaration of Jason R. Bartlett in support of Apple’s Motions in
11 Limine (“Bartlett Declaration”) contains information concerning its non-public product design
12 and development process. Exhibit 10 has been designated as Highly Confidential – Attorneys’
13 Eyes Only. This information is highly sensitive and could be used by Apple’s competitors to
14 Apple’s disadvantage and should be sealed in its entirety.

15 4. It is Apple’s policy not to disclose or describe its non-public product design and
16 development process to third parties. Apple is well known worldwide for its corporate culture of
17 carefully maintaining the confidentiality of its business information. Apple’s Motions in Limine
18 and Exhibit 10 to the Bartlett Declaration reveal highly confidential information that, if disclosed,
19 could be used by Apple’s competitors to Apple’s disadvantage. The requested relief is necessary
20 and narrowly tailored to protect the confidentiality of this information.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th
22 day of July, 2012 at Cupertino, California.

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24 /s/ Cyndi Wheeler
Cyndi Wheeler

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