

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 [charlesverhoeven@quinnemanuel.com](mailto:charlesverhoeven@quinnemanuel.com)

50 California Street, 22<sup>nd</sup> Floor

3 San Francisco, California 94111

Telephone: (415) 875-6600

4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Bar No. 177129)

[kevinjohnson@quinnemanuel.com](mailto:kevinjohnson@quinnemanuel.com)

6 Victoria F. Maroulis (Bar No. 202603)

[victoriamaroulis@quinnemanuel.com](mailto:victoriamaroulis@quinnemanuel.com)

7 555 Twin Dolphin Drive, 5<sup>th</sup> Floor

Redwood Shores, California 94065-2139

8 Telephone: (650) 801-5000

Facsimile: (650) 801-5100

9 Michael T. Zeller (Bar No. 196417)

10 [michaelzeller@quinnemanuel.com](mailto:michaelzeller@quinnemanuel.com)

865 S. Figueroa St., 10th Floor

11 Los Angeles, California 90017

Telephone: (213) 443-3000

12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

23 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

24 TELECOMMUNICATIONS AMERICA,

LLC, a Delaware limited liability company,

25 Defendant.

CASE NO. 11-cv-01846-LHK

**DECLARATION OF HANKIL KANG 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 appended declaration of Hankil Kang in support of Apple's Administrative  
4 Motions to File Documents Under Seal (Dkt. No. 1160), to establish that the following are  
5 sealable:

- 6 • The confidential, unreacted Opposition to Samsung’s Motion to Stay and Suspend the  
7 June 26, 2012 Preliminary Injunction Pending Appeal or, Alternatively, Pending  
8 Decision by Federal Circuit on Stay Pending Appeal (“Opposition”);
- 9 • Exhibits A to the Declaration of Jason R. Bartlett In Support of Apple’s Opposition to  
10 Samsung’s Motion to Stay and Suspend the June 26, 2012 Preliminary Injunction  
11 Pending Appeal or, Alternatively, Pending Decision by Federal Circuit on Stay  
12 Pending Appeal (“Bartlett Declaration”)

13 **DECLARATION OF HANKIL KANG**

14 I, Hankil Kang, do hereby declare as follows:

15 1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this Declaration in  
16 support of Apple’s Administrative Motions to File Under Seal (Dkt. No. 1160). I have personal  
17 knowledge of the facts set forth in this Declaration and, if called as a witness, could and would  
18 competently testify to them.

19 2. Exhibit A to the Bartlett Declaration is an excerpt from the Confidential Brief of  
20 Defendants-Appellees, filed by Samsung in Apple v. Samsung, No. 2012-1105 (Fed. Cir.). This  
21 document contains confidential business information concerning Samsung's sales of the Galaxy  
22 Tab 10.1. This information is confidential and proprietary to Samsung, and could be used to its  
23 disadvantage by competitors if this document was not filed under seal.

24 3. The unredacted version of Apple’s Opposition discusses, references, or cites to the  
25 confidential information described in paragraph 2 above. In addition, Apple’s Opposition contains  
26 confidential information relating to Samsung’s projected sales of the Galaxy Tab 10.1. This  
27 information is confidential and proprietary to Samsung, and could be used to its disadvantage by  
28 competitors if this document was not filed under seal.

1 I declare under penalty of perjury that the forgoing is true and correct to the best of my  
2 knowledge.

3 Executed this 9th day of July, 2012, in Suwon, Korea.  
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5  
6 /s/ Hankil Kang  
7 Hankil Kang  
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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 Hankil Kang has concurred in this filing.

/s/ Victoria Maroulis

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/s/ Victoria Maroulis