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13 Attorneys for SAMSUNG ELECTRONICS
 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**

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I, Bill Trac, declare:

1. I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively, “Samsung”). I submit this declaration in support of Samsung’s Administrative Motion to File Documents Under Seal. Unless otherwise indicated, I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify as follows.

2. The requested relief is necessary to protect the confidentiality of information discussed in Samsung’s Opposition to Apple’s Claim Construction Brief (“Samsung’s Brief”).

3. Samsung’s brief includes discussion and excerpts from documents that Apple has designated HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY. Samsung expects that pursuant to Local Rule 79-5(d), Apple will file a declaration under Local Rule 79-5(d) establishing good cause for filing these confidential materials under seal.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Redwood Shores, California on July 10, 2012.

/s/ 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