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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.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF BILL TRAC IN
 SUPPORT OF APPLE'S
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL DOCUMENTS
 REGARDING APPLE'S OPENING
 SUPPLEMENTAL CLAIM
 CONSTRUCTION BRIEF**

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 Apple's Administrative Motion to File Under Seal Documents Regarding Apple's
6 Opening Supplemental Claim Construction Brief (Dkt No. 1186) . Unless otherwise indicated, I
7 have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I
8 could and would testify as follows.

9 2. The requested relief is necessary to protect the confidentiality of information
10 discussed in Apple's Opening Supplemental Claim Construction Brief ("Brief") and the
11 Declaration of Ravin Balakrishnan, Ph.D. in Support of Apple's Opening Supplemental Claim
12 Construction Brief ("Balakrishnan Declaration").

13 3. Both the Brief and the Balakrishnan Declaration include discussion of the
14 confidential source code for the Tablecloth program that was produced by Mitsubishi Electric
15 Research Laboratories (MERL), a third party to this litigation. This source code has been
16 produced by MERL as Highly Confidential – Attorney's Eyes Only and Highly Confidential –
17 Source Code under the Protective Order.

18 4. Exhibit 6 to the Declaration of Deok Keun Matthew Ahn in Support of Apple's
19 Opening Supplemental Claim Construction Brief ("Ahn Declaration") contains excerpts from the
20 May 2, 2012 Deposition of Andries van Dam. These excerpts do not contain Samsung
21 confidential information. An unredacted version of this document is attached hereto as Exhibit 1.

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23 I declare under penalty of perjury that the foregoing is true and correct. Executed in
24 Redwood Shores, California on July 12, 2012.

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/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