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11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

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

16 APPLE INC., a California corporation,
 17
 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
 24 Defendants.

Case No. 11-cv-01846-LHK

**DECLARATION OF CYNDI WHEELER IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTIONS TO FILE
 DOCUMENTS UNDER SEAL**

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 Samsung’s Administrative Motions to File Under Seal (Dkt. Nos. 1183 and 1185) pursuant to
4 Local Rules 7-11 and 79-5. I have personal knowledge of the matters set forth below. If called as
5 a witness I could and would competently testify as follows.

6 2. Samsung filed a motion to file under seal Samsung’s Claim Construction Brief and
7 Exhibits 2, 4, 6, and 9-14 to the Declaration of Patrick Schmidt in Support of Samsung’s Claim
8 Construction Brief. Apple does not maintain a claim of confidentiality on this material.

9 3. Samsung filed a motion to file under seal the unredacted version of Samsung’s
10 Motions *in Limine* and Exhibits S and T to the Declaration of John D’Amato in Support of
11 Samsung’s Motions *in Limine*. These exhibits contain confidential Apple information.
12 Specifically:

13 4. Exhibit S to the Declaration of John D’Amato consists of excerpts from Apple’s
14 Objections and Responses to Samsung’s Fourth Set of Interrogatories, previously filed as Exhibit
15 67 to the Declaration of Brett Arnold in Support of Samsung’s Motion for Summary Judgment
16 (Dkt. No. 943.) Apple supported sealing with a declaration filed on May 24, 2012. (Dkt. No.
17 973.) Exhibit S contains discussions of manufacturing details and supply chain information. The
18 entire document should be kept under seal.

19 5. Exhibit T to the Declaration of John D’Amato consists of Apple Inc.’s Amended
20 Objections and Responses to Samsung’s Interrogatory Nos. 4, 6, 7, 16, 17, and 18. This
21 document was also previously filed as Exhibit 37 to the Declaration of Brett Arnold in Support of
22 Samsung’s Motion for Summary Judgment (Dkt. No. 943). Apple supported sealing with a
23 declaration filed on May 24, 2012. (Dkt. No. 973.) Exhibit T contains highly confidential and
24 commercially sensitive business information, including confidential information regarding
25 licensing agreements and potential licensing agreements with business partners and Apple’s
26 advertising expenditures. A proposed redacted version was previously filed under Dkt. No. 973-
27 1.

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