

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 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

6 Victoria F. Maroulis (Bar No. 202603)

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)

michaelzeller@quinnemanuel.com

10 865 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 Defendants.

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF HANKIL KANG IN  
SUPPORT OF APPLE'S  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL (DKT. NO.  
1184)**

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 declaration of Hankil Kang in support of Apple’s Administrative Motion  
4 to File Documents Under Seal (Dkt. No. 1184), to establish that portions of the following  
5 document are sealable:

- 6 • Exhibit 2 to the Declaration of Jason Bartlett in Support of Apple’s Motions *in Limine*  
7 (“Bartlett Declaration”).

8 **DECLARATION OF HANKIL KANG**

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

10 1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this declaration in  
11 support of Apple’s Administrative Motion to File Documents Under Seal (Dkt. No. 1184). I have  
12 personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and  
13 would competently testify to them.

14 2. Exhibit 2 to the Bartlett Declaration contains excerpts from the written transcript of  
15 the March 30, 2012 Deposition of Junho Park (Volume 2), which Samsung has designated Highly  
16 Confidential – Attorneys’ Eyes Only under the Protective Order. The redacted portions contain  
17 non-public information regarding specific Samsung competitive analysis practices. This  
18 information is highly confidential and could be used to Samsung’s disadvantage by competitors if  
19 it were not filed under seal. The redacted portions of Exhibit 2 to the Bartlett Declaration should  
20 therefore remain under seal. A proposed redacted version of this document is attached hereto as  
21 Exhibit 1.

22 I declare under penalty of perjury that the forgoing is true and correct to the best of my  
23 knowledge. Executed this 12th day of July, 2012, in Suwon, South Korea.

24  
25   
26  
27 Hankil Kang  
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