

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 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
 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 (PSG)

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

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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 re Apple's Motions *in Limine*.
6 Unless otherwise indicated, I have personal knowledge of the facts set forth in this declaration
7 and, if called upon as a witness, I could and would testify as follows.

8 2. The requested relief is necessary to protect the confidentiality of information
9 discussed in Apple's Motions *in Limine*. Samsung requests that limited portions of Apple's
10 Motions *in Limine* be filed under seal.

11 3. The redacted portions of page 10 of Apple's Motion in Limine discuss material
12 contained in Exhibit 2 to the Declaration of Jason Bartlett in Support of Apple's Motions *in*
13 *Limine*, the March 30, 2012 Deposition of Junho Park (Volume 2). Samsung has designated Mr.
14 Park's deposition transcript Highly Confidential – Attorneys' Eyes Only under the Protective
15 Order. The discussion on page 10 of Apple's Motions thus reveals highly confidential
16 information regarding specific Samsung competitive analysis practices, which could be used to
17 Samsung's disadvantage by competitors if it were not filed under seal. The redacted portions of
18 page 10 of Apple's Motions *in Limine* should therefore remain under seal.

19 4. The redacted portions of page 16 to Apple's Motions in *Limine* contain non-public
20 information regarding Samsung's tax arrangements and financial data, including specific
21 information about Samsung's profits. Samsung has designated this information Highly
22 Confidential – Attorneys' Eyes Only under the Protective Order. This information is highly
23 confidential and could be used to Samsung's disadvantage by competitors if it were not filed under
24 seal. The redacted portions of page 16 of Apple's Motions *in Limine* should, therefore, remain
25 under seal.

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