

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

**DECLARATION OF BILL TRAC IN  
 SUPPORT OF SAMSUNG'S  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS UNDER SEAL**

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 Samsung's Administrative Motion to File Documents Under Seal. Unless otherwise  
6 indicated, I have personal knowledge of the facts set forth in this declaration and, if called upon as  
7 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 Exhibit A to Samsung's Objections to Apple's Exhibit List, Proposed Joint Exhibit  
10 List and Deposition Designations ("Exhibit A").

11 3. Exhibit A contains short descriptions of documents that Samsung has designated  
12 **HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY** under the Protective Order. For the  
13 reasons described below, some of these descriptions contain Samsung confidential information  
14 which could be used to Samsung's disadvantage by competitors if it were not filed under seal.

15 4. The descriptions of Apple Exhibit 51 contains highly confidential information  
16 regarding Samsung's licensing practices. This information is confidential and proprietary to  
17 Samsung, and could be used to its disadvantage by competitors if these documents were not filed  
18 under seal.

19 5. The descriptions of Apple Exhibits 39, 41, 57 60, 61, 62 contain highly confidential  
20 information from documents since 2011 describing Samsung's short-term and long-term business  
21 and product development activities and plans. This information is confidential and proprietary to  
22 Samsung, and could be used to its disadvantage by competitors if these documents were not filed  
23 under seal.

24 6. The descriptions of Apple Exhibits 47 and 49 contain highly confidential  
25 information describing Samsung's international business development plans. This information is  
26 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if  
27 these documents were not filed under seal.

28

1           7.       The description of Apple Exhibit 54 contains highly confidential information  
2 regarding Samsung's consulting relationships. This information is confidential and proprietary  
3 to Samsung, and could be used to its disadvantage by competitors if these documents were not  
4 filed under seal.

5           8.       The descriptions of Apple Exhibits 44, 49, 53, 54, 61 and 62 contain confidential  
6 and highly confidential information that reveal how Samsung undertakes competitive analyses.  
7 This information is confidential and proprietary to Samsung, and could be used to its disadvantage  
8 by competitors if these documents were not filed under seal.

9           9.       The descriptions of Apple Exhibits 35, 39, 41, 42, 44, 45, 46, 57, and 59 contain  
10 confidential trade secret code names for Samsung's mobile device products. This information is  
11 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if  
12 these documents were not filed under seal.

13  
14

15           I declare under penalty of perjury that the foregoing is true and correct. Executed in  
16 Redwood Shores, California on July 13, 2012.

17  
18

/s/ Bill Trac

19  
20

21  
22

23  
24

25  
26

27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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