QUINN EMANUEL URQUHART & SULLIVAN, LLP Charles K. Verhoeven (Cal. Bar No. 170151) charles K. Verhoeven (Cal. Bar No. 170151) Son Francisco, California 94111 Telephone: (415) 875-6600 Facsimile: (415) 875-6700 Kevin P.B. Johnson (Cal. Bar No. 177129) kevin p.B. Johnson (Cal. Bar No. 177129) kevin p.B. Johnson (Cal. Bar No. 177129) kevin of Margune and Cal. Bar No. 177129) kevin and the second solution of the second solution of the second and the second and the second solution of the second solutis the second solutis the second solution to the second solution to					
 charlesverhoeven@quinnemanuel.com Son Erancisco, California 94111 Telephone: (415) 875-6700 Kevin P.B. Johnson (Cal. Bar No. 177129) kevinjohnson@quinnemanuel.com Victorian F. Maroulis (Cal. Bar No. 202603) victorianaroulis@quinnemanuel.com Victorianaroulis@quinnemanuel.com 755 Twin Dolphin Drive 5th Floor Redwood Shores, California 94065 Telephone: (650) 801-5100 Michael T. Zeller (Cal. Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Telephone: (213) 443-3000 Facsimile: (213) 443-3000 Facsimile: (213) 443-3100 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC MORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION APPLE INC., a California corporation, Plaintiff, Plaintiff, Plaintiff, Vs. SAMSUNG ELECTRONICS CO., LTD., a Korean businese entity: SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 			N, LLP		
3 San Francisco, California 94111 Telephone: (415) 875-6700 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 9 Michael T. Zeller (Cal. Bar No. 196417) 10 michaelzeller @quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 12 Facsimile: (213) 443-3000 13 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS 14 MERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC 15 UNITED STATES DISTRICT COURT 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION 18 APPLE INC., a California corporation, Korean business entity; SAMSUNG 20 vs. 21 SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG 23 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 24 Defendants.	2 0	charlesverhoeven@quinnemanuel.com			
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) victoriamerulis@quinnemanuel.com 7 555 Twin Dolphin Drive 5th Floor Redwood Shores, California 94065 8 Telephone: (650) 801-5000 9 Michael T. Zeller (Cal. Bar No. 196417) 10 michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor It Los Angeles, California 90017 11 Los Angeles, California 90017 12 Facsimile: (213) 443-3000 13 Attorneys for SAMSUNG ELECTRONICS CO, LTD., SAMSUNG ELECTRONICS 14 AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC 15 UNITED STATES DISTRICT COURT 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION 18 APPLE INC., a California corporation, Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG CASE NO. 11-cv-01846-LHK 12 SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG CASE NO. 11-cv-01846-LHK 14 Plaintiff, Visc corporation; SAMSUNG Defendants. 15 Defendants. Defendants. <th>3 5</th> <th>San Francisco, California 94111</th> <th></th> <th></th>	3 5	San Francisco, California 94111			
kevinjohnson@quinnemanuel.com 6 Victoria F. Maroulis (Cal. Bar No. 202603) victoriamaroulis@quinnemanuel.com 555 Twin Dolphin Drive 5th Floor Redwood Shores, California 94065 8 7 Statuler@quinnemanuel.com 865 S. Figueroa St., 10th Floor 8 10 michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor 1 Los Angeles, California 90017 Telephone: (213) 443-3000 12 Facsimile: (213) 443-3100 13 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG MERICA, LLC 15 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION 18 APPLE INC., a California corporation, 19 Plaintiff, 19 Vs. 20 vs. 21 SAMSUNG ELECTRONICS CO., LTD., a Korean business entiv; SAMSUNG CASE NO. 11-cv-01846-LHK 21 SAMSUNG ELECTRONICS CO., LTD., a Korean business entiv; SAMSUNG Defendants. 22 LELECOMMUNICATIONS AMERICA, INC., a New York					
 Victoria F. Maroulis (Cal. Bar No. 202603) victoriamaroulis@quinnemanuel.com \$55 Twin Dolphin Drive 5th Floor Redwood Shores, California 94065 Telephone: (650) 801-5100 Michael T. Zeller (Cal. Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 Facsimile: (213) 443-3100 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC IG UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION APPLE INC., a California corporation, Plaintiff, Vs. CASE NO. 11-cv-01846-LHK DECLARATION OF BILL TRAC IN SUPPORT OF SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG ELECTRONICS AMERICA, ILC, a Delaware limited liability company, Defendants. 					
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 TOP CALIFORNIA, SAN JOSE DIVISION 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 Defendants. 24 Defendants.	6 '	Victoria F. Maroulis (Cal. Bar No. 202603)			
8 Telephone: (650) 801-5000 Facsimile: (650) 801-5100 9 Michael T. Zeller (Cal. Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figuenoa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 11 Los Angeles, California 90017 Telephone: (213) 443-3100 12 Facsimile: (213) 443-3100 13 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION 18 APPLE INC., a California corporation, Plaintiff, CASE NO. 11-cv-01846-LHK 19 Plaintiff, DEFCLARATION OF BILL TRAC IN SUPPORT OF SAMSUNG'S ADMINISTRATIVE MOTION TO FI DOCUMENTS UNDER SEAL 20 vs. SAMSUNG 21 SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG Defendants. 23 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 24 Defendants. Defendants.					
9 Michaelz I, Zeller (Cal. Bar No. 196417) michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3100 12 Facsimile: (213) 443-3100 13 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION 18 APPLE INC., a California corporation, 9 CASE NO. 11-cv-01846-LHK 19 Plaintiff, 9 CASE NO. 11-cv-01846-LHK 10 VS. DECLARATION OF BILL TRAC IN SUPPORT OF SAMSUNG'S ADMINISTRATIVE MOTION TO FI DOCUMENTS UNDER SEAL 21 SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG 22 CLECTRONICS AMERICA, INC., a New York corporation; SAMSUNG 23 Defendants. 25 Defendants. 26					
10 michaelzeller@quinnemanuel.com 865 S. Figueroa St., 10th Floor Los Angeles, California 90017 Telephone: (213) 443-3000 11 Los Angeles, California 90017 Telephone: (213) 443-3000 12 Facsimile: (213) 443-3000 13 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC 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 26]				
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Telephone: (213) 443-3000 Facsimile: (213) 443-3100 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC If UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION APPLE INC., a California corporation, Plaintiff, Vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 26	8	865 S. Figueroa St., 10th Floor			
 Attorneys for SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION APPLE INC., a California corporation, Plaintiff, Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 		Telephone: (213) 443-3000			
 CO., LŤD., SAMSUNG ELECTRONICS AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION APPLE INC., a California corporation, Plaintiff, Plaintiff, Vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 					
15TELECOMMUNICATIONS AMERICA, LLC16UNITED STATES DISTRICT COURT16NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION17NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION18APPLE INC., a California corporation, Plaintiff,CASE NO. 11-cv-01846-LHK19Plaintiff, Vs.Declaration of Bill TRAC IN SUPPORT OF SAMSUNG'S ADMINISTRATIVE MOTION TO FI DOCUMENTS UNDER SEAL20vs.NORTHERICA, INC., a New York corporation; SAMSUNGDefendants.23TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants.Defendants.2626Norther StatesNorther States		CO., LTD., SAMSUNG ELECTRONICS			
16UNITED STATES DISTRICT COURT17NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION18APPLE INC., a California corporation,CASE NO. 11-cv-01846-LHK19Plaintiff,Decclaration of Bill Trac IN SUPPORT OF SAMSUNG'S ADMINISTRATIVE MOTION TO FI DOCUMENTS UNDER SEAL20vs.Defendants.21SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,Defendants.24Defendants.Defendants.					
 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. 26 					
 APPLE INC., a California corporation, Plaintiff, Vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 					
 Plaintiff, vs. SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 					
20vs.21SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG22ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG23TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,24Defendants.2526					
 SAMSUNG ELECTRONICS CO., LTD., a Korean business entity; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 	19	Plaintiff,			
 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 26 	20	VS.	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL		
 22 ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG 23 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, 24 Defendants. 26 					
 TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company, Defendants. 26 	22 1	ELECTRONICS AMERICA, INC., a New			
24 Defendants. 25	23 '	TELECOMMUNICATIONS AMERICA,			
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	.		Case No. 11-cv-01846-LHK		
MOTION TO FILE DOCUMENTS UNDER		Т	RAC DECLARATION IN SUPPORT OF SAMSUNG'S MOTION TO FILE DOCUMENTS UNDER SEAL Dockets.Justia.	com	

I, Bill Trac, declare:

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I am an associate in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
 Telecommunications America, LLC (collectively, "Samsung"). I submit this declaration in
 support of Samsung's Administrative Motion to File Documents Under Seal. Unless otherwise
 indicated, I have personal knowledge of the facts set forth in this declaration 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 Exhibit A to Samsung's Objections to Apple's Exhibit List, Proposed Joint Exhibit
10 List and Deposition Designations ("Exhibit A").

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

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

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

-2- Case No. 11-cv-01846-LHK TRAC DECLARATION IN SUPPORT OF SAMSUNG'S MOTION TO FILE DOCUMENTS UNDER SEAL

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.
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15	I declare under penalty of perjury that the foregoing is true and correct. Executed in
16	Redwood Shores, California on July 13, 2012.
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18	/s/ Bill Trac
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1	General Order 45 Attestation
2	I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this
3	Declaration. In compliance with General Order 45(X)(B), I hereby attest that Bill Trac has
4	concurred in this filing.
5	<u>/s/ Victoria Maroulis</u>
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28	-4- Case No. 11-cv-01846-LHK
	TRAC DECLARATION IN SUPPORT OF SAMSUNG'S MOTION TO FILE DOCUMENTS UNDER SEAL