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 12 Attorneys for Plaintiff and  
 Counterclaim-Defendant APPLE INC.

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 15 UNITED STATES DISTRICT COURT  
 16 NORTHERN DISTRICT OF CALIFORNIA  
 17 SAN JOSE DIVISION

18 APPLE INC.,  
 19 Plaintiff,  
 20 v.  
 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.  
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Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF  
 NATHAN SABRI IN SUPPORT OF  
 APPLE'S RENEWED MOTION TO  
 SEAL**

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1 I, NATHAN SABRI, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP, counsel for Apple  
3 Inc. (“Apple”). I am licensed to practice law in the State of California. I have personal  
4 knowledge of the matters stated herein or understand them to be true. I make this declaration in  
5 support of Apple’s Renewed Motion to Seal.

6 2. Through its Renewed Motion to Seal, Apple seeks to seal data created by third-  
7 party market research companies where such data is extensive and risks supplanting the third  
8 party’s market for its report. Apple does not seek to seal passing references or data that focuses  
9 on Apple and Samsung.

10 3. I understand that Apple is contractually obligated to defend the interests of third  
11 parties who sell Apple their proprietary consumer and market studies, and disclosure of this  
12 material would severely harm such third parties competitively and damage Apple’s relationship  
13 with them. The market research companies with which Apple does business operate by selling  
14 their reports, which typically cost many thousands of dollars each.

15 4. Public disclosure of a substantial portion or the entirety one of these reports would  
16 completely supplant the market for that report. If Apple is forced to disclose this information,  
17 which Apple acquired under an agreement to keep the information private and confidential, the  
18 affected third party companies could be reluctant to do business with Apple again in the future,  
19 potentially permanently harming Apple’s relationships and preventing Apple from obtaining this  
20 critical consumer data.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
22 24th day of July, 2012 at San Francisco, California.

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/s/ Nathan Sabri  
Nathan Sabri

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**ATTESTATION OF E-FILED SIGNATURE**

I, Michael A. Jacobs, 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 Nathan Sabri has concurred in this filing.

Dated: July 24, 2012

/s/ Michael A. Jacobs  
Michael A. Jacobs