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15 Attorneys for Plaintiff
APPLE INC.

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

19 APPLE INC.,
20 Plaintiff,
21 v.
22 SAMSUNG ELECTRONICS CO., LTD., a
23 Korean corporation; SAMSUNG
24 ELECTRONICS AMERICA, INC., a New
25 York corporation; and SAMSUNG
TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,
26 Defendants.

Case No.: C-11-01846 (LHK)

DECLARATION OF JOSHUA R. BENSON IN SUPPORT OF NOTICE AND MOTION TO SEAL DOCUMENTS IN SUPPORT OF OPPOSITION TO DEFENDANTS' MOTION TO DISQUALIFY BRIDGES & MAVRAKAKIS, LLP

Date: August 24, 2011
Time: 2:00 p.m.
Place: Courtroom 8, 4th Floor

Honorable Lucy H. Koh

1 I, JOSHUA R. BENSON, declare as follows:

2 1. I am admitted to practice before this Court, and I am an attorney with the law firm
3 of Taylor & Company Law Offices, LLP, counsel to Plaintiff Apple Inc. in the above-captioned
4 case. Except as otherwise stated, the representations made in this declaration are based upon my
5 personal knowledge and, if called upon to do so, I could and would testify competently to the facts
6 stated herein.

7 2. The documents that were redacted and conditionally filed under seal by Plaintiff are
8 properly sealable.

9 3. The confidential version of the Declaration of Kenneth H. Bridges in Support of the
10 Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition")
11 contains confidential, non-public information regarding a settlement meeting that occurred
12 between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a
13 copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties,
14 and will be e-filed with the Court pending the Court's granting of this Motion to Seal.

15 4. The following portions of the Declaration of Kenneth H. Bridges have been
16 properly filed under seal:

- 17 • Page 2, lines 18-27

18 3. The confidential version of the Declaration of Thomas C. Mavrakakis in Support of
19 the Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition")
20 contains confidential, non-public information regarding a settlement meeting that occurred
21 between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a
22 copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties,
23 and will be e-filed with the Court pending the Court's granting of this Motion to Seal.

24 4. The following portions of the Declaration of Thomas C. Mavrakakis have been
25 properly filed under seal:

- 26 • Page 1, lines 20-26

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5. The confidential version of the Declaration of Michael T. Pieja in Support of the Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition") contains confidential, non-public information regarding a settlement meeting that occurred between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties, and will be e-filed with the Court pending the Court's granting of this Motion to Seal.

6. The following portions of the Declaration of Michael T. Pieja have been properly filed under seal:

- Page 1, lines 19-28; and
- Page 2, lines 1-2

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 1st day of August, 2011, in San Francisco, California.

/s/ Joshua R. Benson
JOSHUA R. BENSON