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 APPLE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC.,
 Plaintiff,
 v.
 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 Defendants.

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

**DECLARATION OF BRIAN C. KWOK
 IN SUPPORT OF THE 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, BRIAN C. KWOK, declare as follows:

2 1. I am an associate with the law firm of Bridges & Mavrakakis LLP, counsel of
3 record for plaintiff Apple Inc. (“Apple”) in the above-captioned action. I have been a member of
4 the Bridges & Mavrakakis LLP law firm since it first opened in 2010, and a patent litigator for
5 more than four years with experience handling matters relating to the telecommunications
6 industry. The facts set forth in this declaration are personally known to me to be true, and if called
7 upon to testify about the matters contained in this declaration, I could and would testify
8 competently thereto.

9 2. This declaration is submitted in support of Apple’s Opposition to the Motion to
10 Disqualify the Bridges & Mavrakakis LLP firm as counsel for plaintiff in this action filed on July
11 11, 2011 by defendants Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and
12 Samsung Telecommunications America, LLC (collectively “Samsung”).

13 3. Immediately prior to joining Bridges & Mavrakakis LLP (“the Bridges Firm”), I
14 was an associate in the Palo Alto office of the Houston-based law firm Wong, Cabello, Lutsch,
15 Rutherford & Brucculeri LLP (March 2009 to August 2010). Prior to that, I was an associate at
16 the Kirkland & Ellis LLP law firm working in their San Francisco office (September 2006 to
17 March 2009).

18 4. It was in 2006 at Kirkland & Ellis LLP that I represented Samsung as a client. As
19 part of my work as a first-year associate at that firm, I was assigned to work with Kenneth H.
20 Bridges on matters in which Kirkland & Ellis LLP represented Samsung in actions involving
21 claims asserted by Ericsson Inc., Telefonaktiebolaget LM Ericsson, Sony Ericsson Mobile
22 Communications AB and Sony Ericsson Mobile Communications (USA), Inc. (the “*Ericsson*
23 *Actions*”).

24 5. After the *Ericsson Actions* settled, I represented Apple while I was still an
25 associate at Kirkland & Ellis LLP. None of my work for Apple at Kirkland & Ellis was adverse to
26 Samsung or was related to any Samsung intellectual property, patents, or mobile devices.

27 6. I continued to represent and perform work for Apple after I joined the Wong,
28 Cabello, Lutsch, Rutherford & Brucculeri LLP law firm in 2009.

1 7. When I joined the Bridges Firm law firm in September 2010, I continued to
2 perform work for Apple.

3 8. The work I perform now for Apple relates primarily to licensing and patent
4 strategy. I have performed no work on behalf of Apple in the litigation filed on April 15, 2011 by
5 Apple against Samsung. I also have not performed any work in connection with the case that was
6 filed by Samsung against Apple on April 27, 2011 (*Samsung Electronic Co. Ltd., et al. v. Apple*
7 *Inc.*, United States District Court, Northern District of California, Case No. C-11-02079).

8 9. I have had no substantive communications with Apple's litigation counsel at
9 Morrison & Foerster LLP or Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale")
10 concerning the case Apple filed against Samsung on April 15, 2011 (Case No. C-11-01846) or the
11 case Samsung filed against Apple on April 27, 2011 (Case No. C-11-002079).

12 10. In the course of my work for Apple, I have never used any of the Samsung
13 confidential information I acquired during my representation of Samsung. I have not provided any
14 Samsung confidential information to Apple or to anyone representing Apple, including any
15 attorneys, paralegals or staff affiliated with either the WilmerHale or the Morrison & Foerster LLP
16 law firms.

17 11. Any and all information that is confidential to Samsung and known to myself as a
18 result of my prior representation of Samsung will continue to be maintained by me in the future in
19 a confidential manner, and will not be disclosed to Apple or to any other third party.

20 I declare under penalty of perjury, under the laws of the United States of America, that the
21 foregoing is true and correct. Executed this 1st day of August, 2011, at Palo Alto, California.

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/s/ Brian C. Kwok
BRIAN C. KWOK

