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 12 MOTOROLA MOBILITY LLC

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

16 APPLE, INC., a California Corporation,)

17 Plaintiff,)

18 v.)

19 SAMSUNG ELECTRONICS CO., LTD., a)
 20 Korean corporation; SAMSUNG)
 21 ELECTRONICS AMERICA, INC., a New York)
 22 corporation; SAMSUNG)
 TELECOMMUNICATIONS AMERICA, LLC, a)
 Delaware limited liability company,)

23 Defendants.)

CASE NO.: 11-CV-01846-LHK

**DECLARATION OF
 JENNIFER A. GOLINVEAUX IN
 SUPPORT OF EMERGENCY
 MOTION BY NONPARTY
 MOTOROLA MOBILITY LLC TO
 SEAL EXHIBITS, CLOSE
 COURTROOM, AND SEAL
 PORTIONS OF TRANSCRIPT**

24 [Civ. L.R. 79-5]

25 Date: Expedited Request
 26 Courtroom: 8, 4th Floor
 Judge: Hon. Lucy H. Koh

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DECLARATION OF JENNIFER A. GOLINVEAUX

I, Jennifer A. Golinveaux, declare and state:

1. I am an attorney at law and a partner at Winston & Strawn LLP, counsel for nonparty Motorola Mobility LLC (“Motorola”). I submit this declaration in support of Emergency Motion By Non-Party Motorola Mobility LLC To Seal Exhibits, Close Courtroom, And Seal Portions Of Transcript (“Motorola’s Motion to Seal”). I have personal knowledge of the matters set forth herein, and if called as a witness, could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a proposed redacted version of the Motorola confidential information excerpted by Samsung as contained in proposed Samsung Trial Exhibits 77, 630, and 631. The portions that Motorola requests to be sealed are outlined in blue.

3. Attached hereto as Exhibit 2 is a proposed redacted version of proposed Samsung Trial Exhibit 82. The portions that Motorola requests to be sealed appear on pages 13-15, 17, and 19 (Bates S-794-ITC-005280731 to S-794-ITC-005280733, S-794-ITC-005280735, and S-794-ITC-005280737) and are outlined in blue.

4. Exhibit A, Appendix A to the concurrently submitted Declaration of Thomas V. Miller contains redacted public versions of Exhibits 1 and 2.

5. Pursuant to Civ. L.R. 7-11, on July 26, 2012, counsel for Motorola attempted to obtain a stipulation from parties to this action Apple and Samsung, and Third Party Intervenor Reuters America to the relief sought in Motorola’s Motion to Seal. Samsung has indicated that it does not oppose Motorola’s Motion to Seal. Counsel for Reuters America has responded that he is still checking with his client but that Motorola should assume that Reuters will not stipulate to sealing or closing the courtroom. Apple has not responded to Motorola’s request as of the filing of this declaration.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 26th day of July, 2012, in San Francisco, California.



Jennifer A. Golinveaux

EXHIBIT 1 – REDACTED
LODGED WITH THE CLERK

PROPOSED REDACTED VERSION OF THE
MOTOROLA CONFIDENTIAL INFORMATION
EXCERPTED BY SAMSUNG AS CONTAINED
IN PROPOSED TRIAL EXHIBITS 77, 630, AND
631

EXHIBIT 2 – REDACTED
LODGED WITH THE CLERK

**PROPOSED REDACTED VERSION OF
MOTOROLA CONFIDENTIAL INFORMATION
CONTAINED IN PROPOSED TRIAL EXHIBIT 82**