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13 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 14 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
 15

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

19 APPLE INC., a California corporation,
 20 Plaintiff,
 21 vs.
 22 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 23 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 24 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 25 Defendant.
 26

CASE NO. 11-cv-01846-LHK
**DECLARATION OF PRASHANTH
 CHENNAKESAVAN IN SUPPORT OF
 THE PARTIES' JOINT MOTION
 REGARDING THE SEALING OF TRIAL
 EXHIBITS**

1 I, Prashanth Chennakesavan, declare:

2 1. I am an associate with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively “Samsung”). I have personal knowledge of the
5 facts set forth in this declaration and, if called upon as a witness, I could and would testify to such
6 facts under oath.

7 2. I make this declaration in support of the parties’ Joint Motion Regarding the
8 Sealing of Trial Exhibits.

9 3. On July 25, 2012, the same day that Samsung and Apple Inc. (“Apple”) exchanged
10 their respective trial exhibits, counsel for the parties held a telephonic conference to discuss a joint
11 approach on the presentation of evidence at trial that would minimize the need to seal trial
12 exhibits.

13 4. On July 26, 2012, counsel for the parties participated in an in-person meet-and-
14 confer session to discuss the sealing of trial exhibits.

15 5. During the meet-and-confer session, counsel for the parties exchanged draft
16 proposals about the presentation of evidence at trial that would minimize the need to introduce
17 into evidence exhibits that contain highly-sensitive information.

18 6. While the parties have yet to reach a final agreement that would eliminate the need
19 to introduce into evidence exhibits that contain highly sensitive information altogether, Samsung
20 will negotiate in good faith to minimize the need to seal trial exhibits. Based on my discussions
21 with counsel for Apple, I believe that Apple will also negotiate in good faith.

22

23 I declare under penalty of perjury that the foregoing is true and correct. Executed in Los
24 Angeles, California on July 27, 2012.

25

26 /s/ Prashanth Chennakesavan

27 Prashanth Chennakesavan

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