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13 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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 Defendants.

CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF YOUNGJIN KWON
IN SUPPORT OF THE PARTIES' JOINT
MOTION REGARDING SEALING OF
TRIAL EXHIBITS**

DECLARATION OF YOUNGJIN KWON

I, YoungJin Kwon, do hereby declare as follows:

1. I am a Principal Engineer in the Patent & Technology Analysis Group of Samsung Electronics Co., Ltd.'s Mobile Communications Intellectual Property Center. I submit this Declaration in support of Samsung Electronics Co., Ltd.'s, Samsung Electronics America, Inc.'s, and Samsung Telecommunications America, LLC's ("Samsung's") and Apple Inc.'s ("Apple's") Joint Motion Regarding the Sealing of Trial Exhibits. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to them.

2. The requested relief in the Motion to Seal is necessary to protect the confidentiality of extremely sensitive source code contained in the parties' proposed trial exhibits.

3. Certain trial exhibits I have reviewed contain highly confidential technical information regarding Samsung's products, including source code that reflects the ideas and efforts of Samsung employees for product design, innovation and development. Source Code is protected within Samsung so that only limited numbers of employees have access and copies cannot be made without proper authorization.

4. During this litigation Samsung's source code has been made available for inspection on free standing computers at the offices of Samsung's counsel, with allowances for only a limited number of pages to be printed pursuant to the Protective Order. Additionally, Samsung's source code has only been available to be viewed by Apple's outside counsel and disclosed experts who are not involved competitive decision-making.

5. Samsung's source code is confidential and proprietary to Samsung, and the adverse competitive effects on Samsung could be devastating if Samsung's competitors were able to obtain this information because this document was not filed under seal. Competitors would not have to invest the time and resources into developing their own source code for their products, which Samsung had to invest, and use such information in order to compete with Samsung.

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I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge. Executed this 27th day of July, 2012, in Suwon, South Korea.

Y. J. Kwon