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8 ATTORNEYS FOR THIRD PARTY TOSHIBA CORPORATION

9 **UNITED STATES DISTRICT COURT**  
 10 **NORTHERN DISTRICT OF CALIFORNIA**  
 11 **SAN JOSE DIVISION**

12 APPLE INC., a California Corporation

Case No: 11-cv-01846-LHK

13 Plaintiff,

14 v.

SUPPLEMENTAL DECLARATION OF YUJI  
 UCHIGASAKI IN SUPPORT OF THIRD  
 PARTY TOSHIBA CORPORATION'S  
 REVISED MOTION FOR  
 ADMINISTRATIVE RELIEF TO FILE  
 DOCUMENTS UNDER SEAL PURSUANT  
 TO CIVIL LOCAL RULES 7-11 AND 79-5

15 SAMSUNG ELECTRONICS CO., LTD, a  
 16 Korean business entity; SAMSUNG  
 17 ELECTRONICS AMERICA, INC., a New  
 18 York corporation; SAMSUNG  
 19 TELECOMMUNICATIONS AMERICA,  
 20 LLC, a Delaware limited liability company

21 Defendants.

Judge: The Honorable Lucy H. Koh

22 I, Yuji Uchigasaki, hereby declare that:

23 1. I am a Senior Manager in the IP Licensing & Contracts Department of the  
 24 Intellectual Property Division of Toshiba Corporation ("Toshiba"). I have personal knowledge of  
 25 the matters stated herein and, if called as a witness, I could and would testify competently thereto.

26 2. I have reviewed the portion of Exhibit 3A of Trial Exhibit 630 that relates to a  
 27 license agreement between Toshiba Corporation and Samsung Electronics Co, Ltd., a copy of  
 28 which is attached hereto as Uchigasaki Exhibit 1.

3. It is the practice of Toshiba Corporation to maintain as confidential business  
 information sensitive terms and conditions of Toshiba's license agreements. Toshiba treats the

1 terms of its license agreements that indicate the value of a license as confidential business  
2 information. The financial terms, duration and scope of Toshiba's licenses taken separately each  
3 provide some indication of the value of a license. However, these terms taken together provide a  
4 very strong indication of the value of a license to Toshiba's competitors. These terms are treated  
5 as highly confidential business information of Toshiba. This confidential information is not  
6 generally known by others and is not readily ascertainable by proper means and provides  
7 Toshiba with an opportunity to obtain an advantage over competitors who do not know or use it.

8 4. The information in the sixth column of Exhibit 3A, entitled "Term," in the seventh  
9 column entitled "Licensed Products/Technology" and the information in the last two lines of the  
10 ninth column entitled "Payments" is the type of information that Toshiba maintains as highly  
11 confidential. A redacted form of Exhibit 3A with all Toshiba confidential information removed  
12 is attached as Uchigasaki Exhibit 2.

13  
14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct and that this Declaration was executed on the 30th day of July,  
16 2012 in Tokyo, Japan.

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19 Yuji Uchigasaki  
20 Senior Manager  
21 IP Licensing & Contracts Department  
22 Intellectual Property Division  
23 Toshiba Corporation  
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