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Attorneys for Plaintiff and  
Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

APPLE INC., a California corporation,  
  
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. 11-cv-01846-LHK

**DECLARATION OF HENRI LAMIRAUX IN  
SUPPORT OF APPLE'S MOTION TO SEAL  
TRIAL EXHIBITS**

1 I, Henri Lamiroux, hereby declare as follows:

2 1. I am an employee of Apple Inc. ("Apple"). My title is Vice President of iOS Apps  
3 & Frameworks for Apple. As part of my role, I am very familiar with the development of  
4 Apple's source code and Apple's efforts to ensure that its source code is not disclosed outside of a  
5 select group of individuals at Apple. I submit this declaration in support of Apple's Renewed  
6 Motion to Seal Trial Exhibits. I have personal knowledge of the matters set forth below. If called  
7 as a witness I could and would competently testify as follows.

8 2. I have been employed at Apple since 1990 and am currently the Vice President of  
9 iOS Apps & Frameworks. I received an engineering degree in chemistry from Ecole Nationale  
10 Supérieure de Chimie de Montpellier.

11 3. My responsibilities as Vice President of iOS Apps & Frameworks involve  
12 managing employees who develop the source code, applications and frameworks for Apple's iOS.  
13 iOS is the operating system on Apple's iPhone, iPad and iPod touch products. Part of my  
14 responsibilities include maintaining the security and secrecy of Apple's iOS source code. Apple  
15 does make certain very limited portions of the iOS code available as open source code, but the  
16 large portions of the code relating to the unique functionality of the iOS operating system are not  
17 publicly available.

18 4. Apple source code is provided the highest level of protection and security within  
19 Apple. Physical access to the iOS source code is limited to select groups of authorized Apple  
20 employees, with access being provided only to portions of code on a need-to-know basis. Access  
21 is limited to employees directly involved in software development, management, and security.  
22 The employees with such access must be approved by management as authorized employees,  
23 their accounts must be specifically granted access.

24 5. iOS source code is provided the highest level of protection and security within  
25 Apple because it is not public information and it is at the heart of the success and unique  
26 functionality of its iOS devices including the iPhone, iPad and iPod touch. iOS source code  
27 controls how these devices operate and provides Apple's iOS devices with their unique, easy to  
28 operate user interfaces. Apple has invested billions of dollars in conjunction with the

1 development of its iOS source code. This source code, including the source code files identified  
2 in Appendix A, is extremely valuable. In part, this value exists because Apple's source code is  
3 unique to Apple.

4 6. To preserve this uniqueness, Apple does not share its source code with others or  
5 make it available to the public. Accordingly, disclosure of the source code files listed in  
6 Appendix A to the general public including Apple's competitors would cause Apple significant  
7 competitive harm. If these source code files were to enter the public record, Apple's competitors  
8 would be free to copy Apple's extremely valuable source code. This ability to copy Apple's  
9 source code would give its competitors an unfair competitive advantage, to the significant  
10 detriment to the investment that Apple has made in developing iOS and the specific source code  
11 files listed in Appendix A.

12 7. Any dissemination of source code outside the tight controls maintained within  
13 Apple's or its counsel's facilities poses the risk of unauthorized disclosure and great injury to  
14 Apple. In fact, even in cases such as this one in which source code must be produced (under the  
15 strict guidelines of source code provisions of the Protective Order), Apple does not permit its own  
16 experts to have electronic or hard copies of its source code during litigation.

17 8. Apple's restrictions on access to its source code by third parties and its employees  
18 are especially necessary because the electronic nature of source code renders the code easily  
19 copied.

20 9. The specific portions of Apple source code which we are asking this Court to seal  
21 have always been non-public, and their exposure would cause Apple to lose significant  
22 competitive advantage.

23 10. Plaintiff's Exhibit 121 is a collection of four (4) Apple iOS source code files.  
24 Apple considers these source code files to be trade secrets. Public disclosure of this information  
25 would be extremely harmful to Apple to for the reasons described above.

26 11. Defendant's Exhibit 645 is a collection of one hundred sixty-nine (169) Apple iOS  
27 source code files. Apple considers these source code files to be trade secrets. Public disclosure  
28 of this information would be extremely harmful to Apple to for the reasons described above. To

1 my knowledge, with the exception of part of source code file AVPlayer.h and source code files  
2 MFMailComposeViewController.h and MFMessageComposeViewController.h, this information  
3 has never been publicly disclosed. Apple does not seek to file under seal any public portions of  
4 Exhibit 645.

5 12. Attached as Appendix A is a list of the individual source code files in Exhibits 121  
6 and 645 that Apple seeks to seal for the reasons explained above.

7  
8 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
9 30th day of July, 2012 at Cupertino, California.

10  
11 /s/ Henri Lamiroux  
12 Henri Lamiroux

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## Appendix A to the Declaration of Henri Lamiroux

| <b>Trial Exhibit</b> | <b>Bates range</b>                     |
|----------------------|--|
| Samsung 645          | APLNDC-WH-SC 00000390-400 <sup>1</sup> |
| Samsung 645          | APLNDC-WH-SC 00000401-403              |
| Samsung 645          | APLNDC-WH-SC 00000404-409              |
| Samsung 645          | APLNDC-WH-SC 00000386-389              |
| Samsung 645          | APLNDC-WH-SC 00007695-704              |
| Samsung 645          | APLNDC-WH-SC 00007705                  |
| Samsung 645          | APLNDC-WH-SC 00007706-707              |
| Samsung 645          | APLNDC-WH-SC 00007709-710              |
| Samsung 645          | APLNDC-WH-SC 00007711-713              |
| Samsung 645          | APLNDC-WH-SC 00007708                  |
| Samsung 645          | APLNDC-WH-SC 00007715                  |
| Samsung 645          | APLNDC-WH-SC 00007716-717              |
| Samsung 645          | APLNDC-WH-SC 00007714                  |
| Samsung 645          | APLNDC-WH-SC 00007718                  |
| Samsung 645          | APLNDC-WH-SC 00007719-21               |
| Samsung 645          | APLNDC-WH-SC 00009584                  |
| Samsung 645          | APLNDC-WH-SC 00009585-86               |
| Samsung 645          | APLNDC-WH-SC 00009857-58               |
| Samsung 645          | APLNDC-WH-SC 00009559-72               |
| Samsung 645          | APLNDC-WH-SC 00009859-85               |
| Samsung 645          | APLNDC-WH-SC 00007930                  |
| Samsung 645          | APLNDC-WH-SC 00009573                  |
| Samsung 645          | APLNDC-WH-SC 00009574-75               |
| Samsung 645          | APLNDC-WH-SC 00009886-87               |

<sup>1</sup> Because part of this file is public, a redacted version will be lodged with the Court.

**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b> | <b>Bates range</b>        |
|----------------------|---------------------------|
| Samsung 645          | APLNDC-WH-SC 00009576     |
| Samsung 645          | APLNDC-WH-SC 00009888     |
| Samsung 645          | APLNDC-WH-SC 00009577-79  |
| Samsung 645          | APLNDC-WH-SC 00009889-91  |
| Samsung 645          | APLNDC-WH-SC 00009580     |
| Samsung 645          | APLNDC-WH-SC 00009581-83  |
| Samsung 645          | APLNDC-WH-SC 00009892     |
| Samsung 645          | APLNDC-WH-SC 00009893-95  |
| Samsung 645          | APLNDC-WH-SC 00009896     |
| Samsung 645          | APLNDC-WH-SC 00009897-98  |
| Samsung 645          | APLNDC-WH-SC 00000298     |
| Samsung 645          | APLNDC-WH-SC 00000299     |
| Samsung 645          | APLNDC-WH-SC 00000300     |
| Samsung 645          | APLNDC-WH-SC 00007990-91  |
| Samsung 645          | APLNDC-WH-SC 00007992-94  |
| Samsung 645          | APLNDC-WH-SC 00010108-117 |
| Samsung 645          | APLNDC-WH-SC 00010118-125 |
| Samsung 645          | APLNDC-WH-SC 00009795-802 |
| Samsung 645          | APLNDC-WH-SC 00009803-10  |
| Samsung 645          | APLNDC-WH-SC 00010052-55  |
| Samsung 645          | APLNDC-WH-SC 00009683-87  |
| Samsung 645          | APLNDC-WH-SC 00009688-737 |

**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b> | <b>Bates range</b>             |
|----------------------|--------------------------------|
| Samsung 645          | APLNDC-WH-SC 00010056          |
| Samsung 645          | APLNDC-WH-SC 00009738          |
| Samsung 645          | APLNDC-WH-SC 00010057          |
| Samsung 645          | APLNDC-WH-SC 00009739          |
| Samsung 645          | APLNDC-WH-SC 00010058-60       |
| Samsung 645          | APLNDC-WH-SC 00009740-43       |
| Samsung 645          | APLNDC-WH-SC 00010061-90       |
| Samsung 645          | APLNDC-WH-SC 00009744-78       |
| Samsung 645          | APLNDC-WH-SC 00010100          |
| Samsung 645          | APLNDC-WH-SC 00009787          |
| Samsung 645          | APLNDC-WH-SC 00010091-92       |
| Samsung 645          | APLNDC-WH-SC 00009779-80       |
| Samsung 645          | APLNDC-WH-SC 00010093-99       |
| Samsung 645          | APLNDC-WH-SC 00009781-86       |
| Samsung 645          | APLNDC-WH-SC 00000301-00000304 |
| Samsung 645          | APLNDC-WH-SC 00000410-414      |
| Samsung 645          | APLNDC-WH-SC 00000415-416      |
| Samsung 645          | APLNDC-WH-SC 00009937          |
| Samsung 645          | APLNDC-WH-SC 00009938-40       |
| Samsung 645          | APLNDC-WH-SC 00009606          |
| Samsung 645          | APLNDC-WH-SC 00009907          |
| Samsung 645          | APLNDC-WH-SC 00009607-09       |
| Samsung 645          | APLNDC-WH-SC 00009908-10       |
| Samsung 645          | APLNDC-WH-SC 00009911          |
| Samsung 645          | APLNDC-WH-SC 00009912-21       |
| Samsung 645          | APLNDC-WH-SC 00009935          |
| Samsung 645          | APLNDC-WH-SC 00009936          |
| Samsung 645          | APLNDC-WH-SC 00009948-50       |
| Samsung 645          | APLNDC-WH-SC 00009944-71       |
| Samsung 645          | APLNDC-WH-SC 00009610          |

**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b> | <b>Bates range</b>        |
|----------------------|---------------------------|
| Samsung 645          | APLNDC-WH-SC 00009611-16  |
| Samsung 645          | APLNDC-WH-SC 00009624     |
| Samsung 645          | APLNDC-WH-SC 00009980     |
| Samsung 645          | APLNDC-WH-SC 00009625     |
| Samsung 645          | APLNDC-WH-SC 00009981     |
| Samsung 645          | APLNDC-WH-SC 00009620-23  |
| Samsung 645          | APLNDC-WH-SC 00009975-79  |
| Samsung 645          | APLNDC-WH-SC 00009628-29  |
| Samsung 645          | APLNDC-WH-SC 00009984-87  |
| Samsung 645          | APLNDC-WH-SC 00009630     |
| Samsung 645          | APLNDC-WH-SC 00009631-32  |
| Samsung 645          | APLNDC-WH-SC 00009633     |
| Samsung 645          | APLNDC-WH-SC 00009634-35  |
| Samsung 645          | APLNDC-WH-SC 00009999     |
| Samsung 645          | APLNDC-WH-SC 00010000-01  |
| Samsung 645          | APLNDC-WH-SC 00000305     |
| Samsung 645          | APLNDC-WH-SC 00000306     |
| Samsung 645          | APLNDC-WH-SC 00000307-314 |
| Samsung 645          | APLNDC-WH-SC 00000329-332 |
| Samsung 645          | APLNDC-WH-SC 00000333-336 |
| Samsung 645          | APLNDC-WH-SC 00000337-359 |
| Samsung 645          | APLNDC-WH-SC 00000360-363 |
| Samsung 645          | APLNDC-WH-SC 00000364     |
| Samsung 645          | APLNDC-WH-SC 00000365-369 |
| Samsung 645          | APLNDC-WH-SC 00000327-28  |
| Samsung 645          | APLNDC-WH-SC 00000379     |



**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b>       | <b>Bates range</b>           |
|----------------------------|------------------------------|
| Samsung 645                | APLNDC-WH-SC 00000370-378    |
| Samsung 645                | APLNDC-WH-SC 00000417-432    |
| Samsung 645                | APLNDC-WH-SC 00000380-385    |
| Samsung 645                | APLNDC-WH-SC 00000315-26     |
| Samsung 645                | APLNDC-WH-SC 00007623-25     |
| Samsung 645                | APLNDC-WH-SC 00007459-61     |
| Samsung 645                | APLNDC-WH-SC 00007462-508    |
| Samsung 645                | APLNDC-WH-SC 00007626-27     |
| Samsung 645                | APLNDC-WH-SC 00007628-52     |
| Samsung 645                | APLNDC-WH-SC 00007653-74     |
| Samsung 645                | APLNDC-WH-SC 00007320 - 7431 |
| Samsung 645                | APLNDC-WH-SC 00007909-15     |
| Samsung 645                | APLNDC-WH-SC 00007916-22     |
| Samsung 645                | APLNDC-WH-SC 00007923-29     |
| Samsung 645                | APLNDC-WH-SC 00007902-08     |
| Samsung 645 &<br>Apple 121 | APLNDC-WH-SC 00000078 - 96   |
| Samsung 645 &<br>Apple 121 | APLNDC-WH-SC 00000079 - 126  |
| Samsung 645                | APLNDC-WH-SC 00007987-89     |
| Samsung 645 &<br>Apple 121 | APLNDC-WH-SC 00010644-45     |
| Samsung 645                | APLNDC-WH-SC 00000235 - 247  |
| Samsung 645                | APLNDC-WH-SC 00000458 - 468  |
| Samsung 645                | APLNDC-WH-SC 00000468 - 471  |
| Samsung 645                | APLNDC-WH-SC 00000471 - 475  |
| Samsung 645                | APLNDC-WH-SC 00000475 - 479  |
| Samsung 645                | APLNDC-WH-SC 00000479 - 491  |
| Samsung 645                | APLNDC-WH-SC 00007722-23     |
| Samsung 645                | APLNDC-WH-SC 00007724-46     |

**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b> | <b>Bates range</b>          |
|----------------------|-----------------------------|
| Samsung 645          | APLNDC-WH-SC 00000450-452   |
| Samsung 645          | APLNDC-WH-SC 00000433-444   |
| Samsung 645          | APLNDC-WH-SC 00007747       |
| Samsung 645          | APLNDC-WH-SC 00007748-52    |
| Samsung 645          | APLNDC-WH-SC 00007753-54    |
| Samsung 645          | APLNDC-WH-SC 00007755-768   |
| Samsung 645          | APLNDC-WH-SC 00007769       |
| Samsung 645          | APLNDC-WH-SC 00007770       |
| Samsung 645          | APLNDC-WH-SC 00007771       |
| Samsung 645          | APLNDC-WH-SC 00007772       |
| Samsung 645          | APLNDC-WH-SC 00007773-774   |
| Samsung 645          | APLNDC-WH-SC 00007775-803   |
| Samsung 645          | APLNDC-WH-SC 00007804-807   |
| Samsung 645          | APLNDC-WH-SC 00007808-830   |
| Samsung 645          | APLNDC-WH-SC 00007831       |
| Samsung 645          | APLNDC-WH-SC 00007832-35    |
| Samsung 645          | APLNDC-WH-SC 00007843       |
| Samsung 645          | APLNDC-WH-SC 00007836       |
| Samsung 645          | APLNDC-WH-SC 00007837-42    |
| Samsung 645          | APLNDC-WH-SC 00007844-47    |
| Samsung 645          | APLNDC-WH-SC 00007848-60    |
| Samsung 645          | APLNDC-WH-SC 00000448-449   |
| Samsung 645          | APLNDC-WH-SC 000007874-7889 |
| Samsung 645          | APLNDC-WH-SC 00007874-901   |
| Samsung 645          | APLNDC-WH-SC 00000513 - 517 |
| Samsung 645          | APLNDC-WH-SC 00000453 - 454 |
| Samsung 645          | APLNDC-WH-SC 00007861       |
| Samsung 645          | APLNDC-WH-SC 00007862-63    |
| Samsung 645          | APLNDC-WH-SC 00007931-40    |
| Samsung 645          | APLNDC-WH-SC 00007941-86    |
| Samsung 645          | APLNDC-WH-SC 00007864       |
| Samsung 645          | APLNDC-WH-SC 00007865       |
| Samsung 645          | APLNDC-WH-SC 00007866       |
| Samsung 645          | APLNDC-WH-SC 00007867-73    |

**Appendix A to the Declaration of Henri Lamiroux**

| <b>Trial Exhibit</b> | <b>Bates range</b>        |
|----------------------|---------------------------|
| Samsung 645          | APLNDC-WH-SC 00000492     |
| Samsung 645          | APLNDC-WH-SC 00000496-498 |
| Samsung 645          | APLNDC-WH-SC 00007675-94  |