1 2 3 4 5 6 7	KARL OLSON (SBN 104760) kolson@rocklawcal.com XINYING VALERIAN (SBN 254890) xvalerian@rocklawcal.com RAM, OLSON, CEREGHINO & KOPCZYNS 555 Montgomery Street, Suite 820 San Francisco, California 94111 Telephone: (415) 433-4949 Facsimile: (415) 433-7311 Attorneys for Third-Party REUTERS AMERICA	
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE	
10	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK
11	Plaintiff, v.	DECLARATION OF AMY STEVENS IN SUPPORT OF REUTERS' OPPOSITION
12 13	SAMSUNG ELECTRONICS CO., LTD., a Korean Business entity; SAMSUNG	TO MOTIONS TO SEAL TRIAL AND PRETRIAL EVIDENCE
14	ELECTRONICS AMERICA, INC., a New York corporation; SAMSUNG	Date: No hearing set
15	TELECOMMUNICATIONS AMERICA, LLC, a Delaware limited liability company,	Time: N/A Place: Courtroom 1, 5 th Floor
16	Defendants.	Judge: Hon. Lucy H. Koh
17]	
18	I, Amy Stevens, declare:	
19	1. I have personal knowledge of th	e facts set forth below, except as to those stated on
20	information and belief, and as to those I believe them to be true.	
21	2. I am employed by Reuters America, LLC as the executive editor, professional	
22	news. The following is a short summary of my experience: I was a reporter at the Wall Street	
23	Journal ("WSJ") from 1990-96; I served in various editing roles for the WSJ from 1996-2000;	
24	was deputy page one editor of the WSJ from 2001-2003; editor of the Weekend Journal of the	
25	WSJ from 2004-2006; deputy editor of Conde Nast Portfolio magazine from 2006-2009; and	
26	have held my current job since June 2010.	
27	Reuters is the largest independent interr	national news agency in the world. Each day its
28	news and insight reaches over one billion people	le, including 430,000 financial professionals

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around the world who subscribe to Thomson Reuters desktop products, hundreds of thousands
 legal and tax and accounting professionals, 35 million visitors to Reuters web sites each month
 and 650 TV clients, 1700 text media clients and 1,000 pictures and graphics clients.

I am well-acquainted with media coverage of this lawsuit. Business and
technology reporters from many media organizations are closely following this lawsuit due to the
widespread interest in the disputes between Apple and various companies, including Samsung,
that utilize Google's Android operating system. Mainstream business outlets like the *Wall Street Journal*, Bloomberg and Reuters tend to focus coverage on the case's strategic impact on the
companies, including financial risks for shareholders; publications like *The Recorder* analyze
legal tactics, and sites like *The Verge* dig into the technology.

4. Our organization is providing detailed reporting and analysis on the case because
 our subscribers here in North America and in Asia are interested in the information. Some
 subscribers follow developments in the wireless devices industry, for example. Other subscribers
 are retail and institutional investors who may own stock in Apple, Samsung, or both.

¹⁵ 5. Our reporting on the case also facilitates a broad discourse on the interesting and
 ¹⁶ important issues presented by the case. Our stories, either on Reuters' own platforms or
 ¹⁷ transmitted on the wire, are picked up or otherwise incorporated into the reporting, analysis and
 ¹⁸ commentary of many others.

Although certain colorful aspects of this case (such as Steve Jobs' supposed
 declaration of "thermonuclear" war on Android) have increased the limelight on the case, Reuters
 believes that the journalistic value of the case derives from having a complete picture of the
 evidence and arguments.

7. Our organization, like others in journalism, sees this public and open jury trial as a
 rare opportunity to inform the public about the workings of our justice system, and particularly
 patent law, which has been much in the spotlight because of its use and possible abuse in many
 cases but which may not be well understood by the general public.

8. I am informed and believe that the public is particularly interested in this case
because it is a major dispute between corporate giants that are leaders in the most popular

1	consumer technologies. Millions of people have smartphones and tablets like the ones at issue in	
2	this case.	
3	9. I am informed and believe that maximum public access to the records in this case	
4	is important to consumers and investors. The wide coverage and interest in this case supports	
5	this belief.	
6	10. Maximum public access to the records in this case increases public understanding	
7	of the workings of the court and promotes discussion about patent policy and intellectual property	
8	trends in general.	
9	11. Based on my professional experience, and talking to those Reuters employees who	
10	have covered Silicon Valley, I do not believe that the level of secrecy and secrecy measures that	
11	Apple claims to have actually reflects the true level of secrecy at Apple. By way of example, the	
12	profit margins on Apple's iPhone and iPad were disclosed last week, and previously other	
13	websites have published estimates of the cost of its components.	
14	I declare under penalty of perjury under the laws of the United States of America that the	
15	foregoing is true and correct.	
16	Executed in New York, New York, on August 3, 2012.	
17	/s/ Amy Stevens	
18	Amy Stevens	
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1	SIGNATURE ATTESTATION	
2	I hereby attest that I have on file all holograph signatures for any signatures indicated by a	
3	"conformed" signature (/s/) within this e-filed document.	
4	Dated: August 2, 2012 By: /s/ Karl Olson	
5	Karl Olson (SBN 104760) RAM, OLSON, CEREGHINO & KOPCZYNSKI	
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8	Attorneys for Reuters America LLC	
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