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

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

21 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New
 York corporation; SAMSUNG
 23 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

24 Defendants.
 25

CASE NO. 11-cv-01846-LHK

**DECLARATION OF BRETT ARNOLD IN
 SUPPORT OF SAMSUNG'S
 STIPULATED ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL ITS
 REPLY BRIEF IN SUPPORT OF ITS
 MOTION TO COMPEL**

1 I, Brett Arnold, declare:

2 1. I am an associate in 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"). Unless otherwise indicated, I
5 have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I
6 could and would testify as follows.

7
8 2. Samsung's Reply In Support of Its Motion to Compel Apple to Produce Documents
9 And Things In Response to Samsung's Request for Production No. 1 and Further Responses to
10 Interrogatories Nos. 1, 3, and 6 (the "Reply") contains information relating to Apple's design trade
11 practices and policies, which Apple has declared to be highly confidential.

12 3. The Reply also contains reference to communications between counsel for Apple
13 and Samsung that Apple designated as HIGHLY CONFIDENTIAL – ATTORNEY'S EYES
14 ONLY under the interim protective order.

15
16 4. The Reply also contains reference to certain of Apple's responses to Samsung's
17 interrogatory requests, which Apple designated as HIGHLY CONFIDENTIAL – ATTORNEY'S
18 EYES ONLY under the interim protective order.

19 5. On Friday, September 9, 2011, counsel for Apple confirmed with counsel for
20 Samsung that Apple does not oppose Samsung's Motion to Seal.

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23 I declare under penalty of perjury that the foregoing is true and correct. Executed in
24 Redwood Shores, California on September 12, 2011.

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26 /s/ Brett Arnold
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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Brett Arnold has concurred in this filing.

/s/ Victoria Maroulis