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13 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 14 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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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 Defendant.
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF HANKIL DANIEL
 KANG IN SUPPORT OF SEALING
 APPLE'S MOTION TO COMPEL, THE
 DECLARATION OF MINN CHUNG, AND
 EXHIBIT J OF THE DECLARATION OF
 JASON R. BARTLETT IN SUPPORT OF
 APPLE'S MOTION TO COMPEL**

1 Pursuant to Civil L.R. 79-5(d), Defendants Samsung Electronics Co., Ltd., Samsung
2 Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively
3 “Samsung”) submit the appended declaration of Hankil Daniel Kang in support of Apple’s
4 Administrative Motion to File Under Seal (Dkt. No. 249), to establish that the following are
5 sealable:

- 6 • Sections II.B and II.C (on pages 6 and 7) of the Memorandum of Points and
7 Authorities submitted with Apple’s Motion to Compel Samsung to Produce Documents
8 and Provide Responsive Answers to Propounded Discovery (“Apple’s Motion to
9 Compel”);
- 10 • Page 9, line 25 to page 10, line 4 of the Memorandum of Points and Authorities
11 submitted with Apple’s Motion to Compel;
- 12 • Paragraphs 7, 8, 12, 13, 14, 16, 19, and 20 of the Declaration of Minn Chung in
13 Support of Apple’s Motion to Compel (“Chung Declaration”); and
- 14 • Exhibit J of the Declaration of Jason R. Bartlett in Support of Apple’s Motion to
15 Compel.

16 **DECLARATION OF HANKIL DANIEL KANG**

17 I, Hankil Daniel Kang, do hereby declare as follows:

18 1. I am Legal Counsel at Samsung Electronics Co., Ltd. I submit this Declaration in
19 support of Apple’s Administrative Motion to File Under Seal (Dkt. No. 249). I have personal
20 knowledge of the facts set forth in this Declaration and, if called as a witness, could and would
21 competently testify to them.

22 2. Paragraphs 7, 8, 12, 13, 14, 16, 19, and 20 of the Declaration of Minn Chung in
23 Support of Apple’s Motion to Compel summarize and describe the contents of Samsung’s
24 documents which were designated HIGHLY CONFIDENTIAL-ATTORNEYS’ EYES ONLY
25 under the interim protective order. These documents contain highly confidential and
26 commercially sensitive business information, including confidential information from the files of
27 Samsung’s designers relating to the design of Samsung’s products, confidential information
28 regarding the technical specifications for Samsung’s products, and confidential information

1 regarding the strategy discussions and analyses run by Samsung regarding its products. This
2 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
3 competitors if it were not filed under seal.

4 3. Exhibit J of the Declaration of Jason R. Bartlett in Support of Apple's Motion to
5 Compel further summarizes and describes the content of Samsung's documents which were
6 designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY under the interim
7 protective order. Exhibit J discusses the content of documents that reference Samsung's
8 strategies regarding design and manufacturing processes. These documents contain highly
9 confidential and commercially sensitive business information, including confidential information
10 from the files of Samsung's designers relating to the design of Samsung's products, as well as
11 confidential information regarding the technical or manufacturing specifications for Samsung's
12 products. This information is confidential and proprietary to Samsung, and could be used to its
13 disadvantage by competitors if it were not filed under seal.

14 4. Sections II.B and II.C (on pages 6 and 7) and page 9, line 25 to page 10, line 4 of
15 the Memorandum of Points and Authorities submitted with Apple's Motion to Compel summarize,
16 describe and/or directly cite to the confidential portions of the Chung Declaration discussed in
17 paragraph 2 above. Therefore, these sections and pages should remain under seal for the same
18 reasons articulated above.

19 5. The requested relief is necessary and narrowly tailored to protect this confidential
20 information. The exhibits described above do not contain significant relevant, non-confidential
21 material.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 forgoing is true and correct to the best of my knowledge.

24 Executed this 27th day of September 2011, in Seoul, Korea.

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/s/ Hankil Daniel Kang

Hankil Daniel Kang

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GENERAL ORDER ATTESTATION

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file the foregoing CERTIFICATE OF SERVICE. In compliance with General Order 45 (X)(B), I hereby attest that Hankil Daniel Kang has concurred in this filing.

DATE: September 27, 2011

/s/ Victoria Maroulis