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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 SCOTT HALL IN
 SUPPORT OF SAMSUNG'S MOTION TO
 FILE DOCUMENTS UNDER SEAL**

1 I, Scott Hall, declare:

2 1. I am an attorney 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. The requested relief is necessary to protect the confidentiality of information
9 discussed in Samsung's Motion to Compel Production of Documents and Things and Responsive
10 Answers to Propounded Discovery; the Declaration of Diane C. Hutnyan in Support of Samsung's
11 Motion to Compel Production of Documents and Things and Responsive Answers to Propounded
12 Discovery ("Hutnyan Declaration"); and the exhibits attached thereto. These documents contain
13 information and references from documents that the parties have designated as Highly
14 Confidential – Attorneys' Eyes Only. These documents reveal the content of Samsung's and
15 Apple's sensitive, internal, business documents, the disclosure of which could cause serious
16 business harm to Samsung.

17
18 3. Exhibit 1 of the Hutnyan Declaration consists of excerpts from the deposition
19 transcript of Mr. Bas Ording, an Apple witness, that Apple has designated as HIGHLY
20 CONFIDENTIAL — ATTORNEYS EYES ONLY.

21
22 4. Exhibit 2 consists of excerpts from the deposition transcript of Mr. Steven
23 Christensen, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL.

24
25 5. Exhibit 3 is several photographs that Samsung took of Apple's 035 mockup during
26 inspections on October 20 and November 1, 2011. Apple has designated these photographs as
27 HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY.

1 6. Exhibit 4 is a true and correct copy of a letter dated November 22, 2011, discussing
2 documents and information that Apple has designated as HIGHLY CONFIDENTIAL–
3 ATTORNEY’S EYES ONLY.

4 7. Exhibit 5 is a true and correct copy of a letter dated November 28, 2011, discussing
5 documents and information that Apple has designated as HIGHLY CONFIDENTIAL–
6 ATTORNEY’S EYES ONLY.

7 8. Exhibit 5 is a true and correct copy of a letter dated November 29, 2011, discussing
8 documents and information that Apple has designated as HIGHLY CONFIDENTIAL–
9 ATTORNEY’S EYES ONLY.

10 9. Exhibit 7 is a true and correct copy of a letter dated November 8, 2011, discussing
11 the deposition testimony of Mr. Douglas Satzger, an Apple witness, which Apple has designated
12 as HIGHLY CONFIDENTIAL– ATTORNEY’S EYES ONLY.

13 10. Exhibit 8 consists of true and correct copies of documents produced by Apple in
14 this action, Bates labeled APLNDC-NCC00000267-273, which Apple has designated as HIGHLY
15 CONFIDENTIAL – ATTORNEY’S EYES ONLY.

16 11. Exhibit 9 consists of true and correct copies of documents produced by Apple in
17 this action, Bates labeled APLNDC0000036646, 36657, 36892, 37167 and 37177, which Apple
18 has designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY.

19 12. Exhibit 10 consists of excerpts from the deposition transcript of Mr. Eugene
20 Whang, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL.

21 13. Exhibit 11 is a true and correct copy of a letter dated November 8, 2011, discussing
22 documents and information which Apple has designated as HIGHLY CONFIDENTIAL–
23 ATTORNEY’S EYES ONLY.

1 14. Exhibit 12 is a true and correct copy of a document produced by Apple in this
2 action, Bates labeled APLNDC0001205801, which Apple has designated as HIGHLY
3 CONFIDENTIAL – ATTORNEY’S EYES ONLY.

4 15. Exhibit 13 is a true and correct copy of a letter dated November 8, 2011, discussing
5 documents and information which Apple has designated as HIGHLY CONFIDENTIAL–
6 ATTORNEY’S EYES ONLY.

7 16. Exhibit 15 consists of excerpts from the deposition transcript of Mr. Peter Russell-
8 Clarke, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL–
9 ATTORNEY’S EYES ONLY

10 17. Exhibit 16 consists of excerpts from the deposition transcript of Mr. Richard
11 Howarth, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL–
12 ATTORNEY’S EYES ONLY.

13 18. Exhibit 17 consists of excerpts from the deposition transcript of Mr. Matthew
14 Rohrbach, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL–
15 ATTORNEY’S EYES ONLY.

16 19. Exhibit 18 consists of excerpts from the deposition transcript of Mr. Christopher
17 Stringer, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL– OUTSIDE
18 COUNSEL ONLY.

19 20. Exhibit 19 consists of excerpts from the deposition transcript of Mr. Douglas
20 Satzger, an Apple witness, that Apple has designated as HIGHLY CONFIDENTIAL–
21 ATTORNEY’S EYES ONLY.

22 21. Exhibit 21 is a true and correct copy of a letter dated October 21, 2011, discussing
23 documents and information which Apple has designated as HIGHLY CONFIDENTIAL–
24 ATTORNEY’S EYES ONLY.

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

/s/ Scott Hall
Scott Hall

