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8 Attorneys for Plaintiff
 APPLE INC.

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12 SAN JOSE DIVISION

14 APPLE INC., a California corporation,
 15 Plaintiff,
 16 v.
 17 SAMSUNG ELECTRONICS CO., LTD., A
 Korean business entity; SAMSUNG
 18 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 19 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company.,
 20 Defendants.
 21

Case No. 4:11-cv-01846-LHK

**DECLARATION OF JAYNA R.
 WHITT IN SUPPORT OF
 APPLE'S STIPULATED
 ADMINISTRATIVE MOTION TO
 FILE DOCUMENTS UNDER
 SEAL**

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I, Jayna R. Whitt, do hereby declare as follows:

1. I hold the position of Director, Patent Litigation at Apple Inc. (“Apple”). I submit this declaration in support of Apple’s Administrative Motion to File Documents Under Seal. If called as a witness, I could and would testify competently as follows.

2. The requested relief is necessary and narrowly tailored to protect the confidentiality of the information contained in the Declaration of Richard J. Lutton in Support of Apple’s Opposition to Defendants’ Motion to Compel Apple to Produce Expedited Reciprocal Discovery (the “Lutton Opposition Declaration”), and portions of Apple’s opposition brief that reference this declaration. Specifically, the Lutton Opposition Declaration contains information relating to Apple’s product launch and marketing strategies, as well as its business practices. Apple does not to disclose or comment on speculation about its business practices. This information can be used by Apple’s competitors to its disadvantage.

I declare under the penalty of perjury under the laws of the United States of America that the forgoing is true and correct to the best of my knowledge and that this Declaration was executed this 7th day of June, 2011, at Cupertino, California.

Dated: June 7, 2011

By: /s/ Jayna R. Whitt
Senior Director and Chief Patent Counsel at
Apple Inc.

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ECF ATTESTATION

I, JASON R. BARTLETT, am the ECF User whose ID and password are being used to file the following document: DECLARATION OF JAYNA R. WHITT IN SUPPORT OF APPLE'S STIPULATED ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL. In compliance with General Order 45, X.B., I hereby attest that Jayna R. Whitt has concurred in this filing.

Dated: June 7, 2011

**JASON R. BARTLETT
MORRISON & FOERSTER LLP**

By: /s/ Jason R. Bartlett
JASON R. BARTLETT