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14 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

15 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

24 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

25 TELECOMMUNICATIONS AMERICA,

LLC, a Delaware limited liability company,

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Defendant.

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CASE NO. 11-cv-01846-LHK

DECLARATION OF DIANE C. HUTNYAN IN SUPPORT OF SAMSUNG'S MOTION FOR A PROTECTIVE ORDER

Date: January 18, 2012

Time: 2:00 p.m.

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

[PROPOSED] PUBLIC REDACTED VERSION

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I, Diane C. Hutnyan, declare:

1. I am a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Telecommunications America, LLC (collectively, "Samsung") in this action. Unless otherwise indicated, I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify as follows.

2. **Exhibit A** is a true and correct copy of Samsung's Proposed Protective Order. It is a redlined modification of Apple's Proposed Protective Order.

3. **Exhibits B-K** are true and correct copies of documents produced by Apple to Quinn Emanuel Urquhart & Sullivan, LLP as counsel for Samsung in response to its discovery requests.

4. **Exhibit L** is a true and correct copy of Apple's Proposed Protective Order as received by Quinn Emanuel Urquhart & Sullivan, LLP.

DATED: January 10, 2011

Respectfully submitted,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By/s/ Diane C. Hutnyan
Diane C. Hutnyan
Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC