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14	AMERICA, INC. and SAMSUNG TELECOMMUNICATIONS AMERICA, LLC	
15	,,	
16	UNITED STATES	DISTRICT COURT
17	NORTHERN DISTRICT OF CA	LIFORNIA, SAN JOSE DIVISION
18	APPLE INC., a California corporation,	CASE NO. 11-cv-01846-LHK
19	Plaintiff,	DECLARATION OF BILL TRAC IN SUPPORT OF SAMSUNG'S
20	VS.	ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL
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.	
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02198.51855/4572495.1		Case No. 11-cv-01846-LHK TRAC DECLARATION IN SUPPORT OF SAMSUNG'S
		MOTION TO FILE DOCUMENTS UNDER SEAL Dockets.Justia.com

I, Bill Trac, declare:

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- 1. I am an associate 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"). 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. The requested relief is necessary to protect the confidentiality of information
 discussed in Samsung's Motion to Supplement Invalidity Contentions ("Samsung's Motion"),
 Exhibits O-W to the Declaration of Alex Baxter in Support of Samsung's Motion ("Baxter
 Declaration"), and Exhibits 7-8 to the Declaration of Todd Briggs in Support of Samsung's
 Motion ("Briggs Declaration"). Those documents contain information and quotations from
 documents that the parties or third parties have designated as confidential.
- 3. Exhibits O, P, and Q to the Baxter Declaration are excerpts from the deposition of
 Apple's inventors Imran Chaudhri, Bas Ording, and Steven Christensen. These transcripts have
 been designated as Highly Confidential Attorneys' Eyes Only by Apple.
- Exhibits R, T, U and V to the Baxter Declaration are excerpts from the deposition
 of Richard Woolley and accompanying exhibits from Cirque Corporation, a third party deponent.
 The transcript and exhibits discuss confidential information regarding both Apple and Cirque, and
 have been designated as Confidential Attorneys' Eyes Only by Apple.
- 5. Exhibit S to the Baxter Declaration are excerpts from the deposition of Dr. Shawn
 P. Day from Synaptics Corporation, a third party deponent. The transcript discusses confidential
 information regarding Synaptics that has been designated as Confidential Attorneys' Eyes Only
 by Synaptics.

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1	6. Exhibit W to the Baxter Declaration is an excerpt from Apple's Objections and	
2	Responses to Samsung's First Set of Interrogatories. This document has been designated as	
3	Highly Confidential – Attorneys' Eyes Only by Apple.	
4	7. Exhibits 7 and 8 to the Briggs Declaration are Invalidity Contentions for the '129	
5	and '607 patents that reference confidential business information from Synaptics Corporation and	
6 7	Cirque Corporation, and have been designated as Highly Confidential – Attorney's Eyes Only	
8	under the protective order.	
9	8. Samsung's Motion contains discussion of the aforementioned exhibits, which have	
10	been designated as Confidential – Attorneys' Eyes Only or Highly Confidential – Attorneys' Eyes	
11		
12	only by Apple, Synaptics, and/or Cirque.	
13	9. Attached as Exhibits 1-3 are the [Proposed] Public Redacted Versions of the	
14	documents that are being submitted under seal.	
15		
16	I declare under penalty of perjury that the foregoing is true and correct. Executed in	
17	Redwood Shores, California on January 26, 2012.	
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19	/s/ Bill Trac	
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	MOTION TO FILE DOCUMENTS UNDER SEAL	

1	General Order 45 Attestation	
2	I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this	
3	Declaration. In compliance with General Order 45(X)(B), I hereby attest that Bill Trac has	
4	concurred in this filing.	
5	<u>/s/ Victoria Maroulis</u>	
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	TRAC DECLARATION IN SUPPORT OF SAMSUNG'S MOTION TO FILE DOCUMENTS UNDER SEAL	