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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 BILL TRAC IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Bill Trac, declare:

2 1. I am an associate 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 Supplement Invalidity Contentions (“Samsung’s Motion”),
10 Exhibits O-W to the Declaration of Alex Baxter in Support of Samsung’s Motion (“Baxter
11 Declaration”), and Exhibits 7-8 to the Declaration of Todd Briggs in Support of Samsung’s
12 Motion (“Briggs Declaration”). Those documents contain information and quotations from
13 documents that the parties – or third parties – have designated as confidential.
14

15 3. Exhibits O, P, and Q to the Baxter Declaration are excerpts from the deposition of
16 Apple’s inventors Imran Chaudhri, Bas Ording, and Steven Christensen. These transcripts have
17 been designated as Highly Confidential – Attorneys’ Eyes Only by Apple.

18 4. Exhibits R, T, U and V to the Baxter Declaration are excerpts from the deposition
19 of Richard Woolley and accompanying exhibits from Cirque Corporation, a third party deponent.
20 The transcript and exhibits discuss confidential information regarding both Apple and Cirque, and
21 have been designated as Confidential – Attorneys’ Eyes Only by Apple.
22

23 5. Exhibit S to the Baxter Declaration are excerpts from the deposition of Dr. Shawn
24 P. Day from Synaptics Corporation, a third party deponent. The transcript discusses confidential
25 information regarding Synaptics that has been designated as Confidential – Attorneys’ Eyes Only
26 by Synaptics.
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General Order 45 Attestation

I, Victoria F. Maroulis, am the ECF user whose ID and password are being used to file this Declaration. In compliance with General Order 45(X)(B), I hereby attest that Bill Trac has concurred in this filing.

/s/ Victoria Maroulis