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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 ALEX BAXTER IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Alex Baxter, 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 Exhibit 4 to the Declaration of Todd Briggs in Support of Samsung's Motion to
10 Supplement Invalidity Contentions ("Briggs Declaration"). Those documents contain
11 information and quotations from documents that the parties have designated as confidential.

12 3. Exhibit 4 to the Briggs Declaration is an Invalidity Contention for the '891 patent
13 that includes source code from Apple, which has been designated by Apple as Apple Confidential
14 – Outside Attorney's Eyes Only – Source Code under the protective order.

15
16 4. Attached as Exhibits 1 is the [Proposed] Public Redacted Versions of Exhibit 4 to
17 the Briggs Declaration.

18
19 I declare under penalty of perjury that the foregoing is true and correct. Executed in
20 Redwood Shores, California on January 27, 2012.

21
22 /s/ Alex Baxter

23 Alex Baxter

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