

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

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 SAM STAKE IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 I, Sam Stake, 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 Unopposed Motion for Issuance of a Request for Judicial Assistance and
10 exhibits 1-6 to the Declaration of Sam Stake in Support of Samsung's Unopposed Motion for
11 Issuance of a Request for Judicial Assistance ("the Stake Declaration").

12 3. Exhibits 1, 2, 5 and 6 to the Stake Declaration consist of excerpts of deposition
13 testimony of Apple employees that has been marked as Highly Confidential – Attorney’s Eyes
14 Only – under the protective order.

15
16 4. Exhibits 3 and 4 to the Stake Declaration consist of internal Apple reports and
17 emails that Apple has marked as Highly Confidential – Attorney’s Eyes Only – under the
18 protective order.

19 5. It is necessary to redact the public versions of Samsung's Unopposed Motion for
20 Issuance of a Request for Judicial Assistance to the extent this document quotes from or reveals
21 information from the confidential materials discussed above.

22
23 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
24 Francisco, California on February 3, 2012.

25
26 /s/ Sam Stake

27 Sam Stake

28

