

EXHIBIT 2

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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

19
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,

26 Defendant.
27

CASE NO. 11-cv-01846-LHK

**DECLARATION OF HANKIL KANG IN
SUPPORT OF SAMSUNG'S REPLY IN
SUPPORT OF ITS MOTION FOR A
PROTECTIVE ORDER PRECLUDING
THE DEPOSITIONS OF SIX HIGH-
RANKING SAMSUNG EXECUTIVES**

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DECLARATION OF HANKIL KANG

I, Hankil Kang, declare as follows:

1. I am Legal Counsel for Samsung Electronics Co., Ltd., in the above-entitled action. I make this declaration of personal, first-hand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. Based on my role as Legal Counsel, I am familiar with the organizational and reporting structure for Samsung Electronics Co., Ltd. (“SEC”) and its subsidiary, Samsung Telecommunications America, LLC (“STA”) (collectively “Samsung”) and with Samsung’s products.

3. Since 2010, Gee-Sung Choi has been the Vice-Chairman and Chief Executive Officer of SEC. During his career at Samsung, Mr. Choi has held the positions of: President of Corporate Management (2010); President of the Digital Media & Communications Division (2009-2010); President of the Telecommunications Division (2007-2009); and President of the Digital Media Division (2004-2007). Mr. Choi has also worked in the Semiconductor Division.

4. [REDACTED]

5. [REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed March 19, 2012, at Suwon, Korea.


Hankil Kang