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14 Attorneys for SAMSUNG ELECTRONICS CO.,
15 LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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,
26 LLC, a Delaware limited liability company,

27 Defendant.

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 have
5 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 contained in Samsung’s Opposition to Apple’s Motion for Partial Summary Judgment, the
10 Declaration of David Hecht (“Hecht Declaration”), and Exhibits H, J1-J11, K1-K3, L, M, P1-P2,
11 and S1-S2 to the Hecht Declaration.

12 3. Exhibit H to the Hecht Declaration is a presentation made by Samsung to Apple,
13 and contains information about licensing proposals that Samsung made to Apple. This document,
14 which Samsung has designated “Confidential Business Information – Subject to Protective Order”
15 in the 337-ITC-796 action between Samsung and Apple, contains information that is confidential
16 and proprietary to Samsung, and could be used to its disadvantage by competitors if it were not
17 filed under seal.

18
19 4. Exhibits J1-J11 to the Hecht Declaration are letters between Apple and Samsung
20 discussing licensing to Samsung’s patents. These documents, which Samsung has designated
21 “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” contain information that is
22 confidential and proprietary to Samsung, and could be used to its disadvantage by competitors if it
23 were not filed under seal.

24
25 5. Exhibits K1-K3 to the Hecht Declaration are license agreements between Samsung
26 and Intel. These documents, which Samsung has designated “Confidential Business Information –
27 Subject to Protective Order” in the 337-ITC-794 action between Samsung and Apple, contains

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GENERAL ORDER ATTESTATION

I, Victoria Maroulis, am the ECF user whose ID and password are being used to file the foregoing document. I hereby attest pursuant to General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Bill Trac.

/s/ Victoria Maroulis