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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 JOBY MARTIN IN
 SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

Date: April 9, 2012

Time: 10:00 a.m.

Place: Courtroom 5, 4th Floor

Judge: Hon. Paul S. Grewal

1 I, Joby Martin, 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 2. The requested relief is necessary to protect the confidentiality of information
8 contained in Samsung's Supplemental Response to Apple's Corrected Reply in Support of Rule
9 37(b)(2) Motion re: Samsung's Alleged Violation of January 27, 2012 Damages Discovery Order,
10 as well as the Declaration of Christopher E. Price and exhibits thereto ("Price Declaration"), and
11 the Declaration of Beomjoon Kim ("Kim Declaration").

12 3. Exhibit A to the Price Declaration consists of excerpts from the March 30, 2012
13 deposition transcript of Timothy Sheppard, which is designated as HIGHLY CONFIDENTIAL —
14 ATTORNEY'S EYES ONLY. This document contains highly sensitive commercial information
15 concerning the contents of spreadsheets drawn from Samsung's accounting databases, and
16 Samsung's supplier and subsidiary relationships. This information is confidential and proprietary
17 to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal.

18 4. Exhibit B to the Price Declaration consists of excerpts from the March 31, 2012
19 deposition transcript of Jaehwang Sim, which is designated as HIGHLY CONFIDENTIAL —
20 ATTORNEY'S EYES ONLY. This document contains highly sensitive commercial information
21 concerning the preparation of spreadsheets drawn from Samsung's accounting databases. This
22 information is confidential and proprietary to Samsung, and could be used to its disadvantage by
23 competitors if it were not filed under seal.

24 5. Exhibit C to the Price Declaration is a copy of the Expert Report of Terry Musika,
25 dated March 22, 2012, which contains highly sensitive commercial information concerning
26 Samsung's and Apple's sales, revenues, costs, and profits, as well as confidential licenses with
27 third parties.

1 6. Exhibit I to the Price Declaration consists of excerpts from the March 10, 2012
2 deposition transcript of Jaehwang Sim, which is designated as HIGHLY CONFIDENTIAL —
3 ATTORNEY'S EYES ONLY. This document contains highly sensitive commercial information
4 concerning the organization and reporting structures of Samsung's finance and accounting
5 departments, the contents of spreadsheets drawn from Samsung's accounting databases, and
6 Samsung's supplier and subsidiary relationships. This information is confidential and proprietary
7 to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal.

8 7. Exhibit J to the Price Declaration consists of excerpts from the March 30, 2012
9 deposition transcript of Timothy Sheppard, which is designated as HIGHLY CONFIDENTIAL —
10 ATTORNEY'S EYES ONLY. This document contains highly sensitive commercial information
11 concerning the contents of spreadsheets drawn from Samsung's accounting databases, and
12 Samsung's supplier and subsidiary relationships. This information is confidential and proprietary
13 to Samsung, and could be used to its disadvantage by competitors if it were not filed under seal.

14 8. Exhibit K to the Price Declaration is a true and correct copy of a document
15 produced by Samsung in this action beginning at Bates number SAMNDCA00372946 and
16 designated HIGHLY CONFIDENTIAL — ATTORNEY'S EYES ONLY. This document
17 contains highly sensitive financial data drawn from Samsung's confidential and proprietary
18 accounting database, and could be used to its disadvantage by competitors if it were not filed
19 under seal.

20 9. The confidential, unredacted version of the Kim Declaration discusses and
21 references highly sensitive confidential information relating to Samsung's storage and
22 management of its financial data.

23 10. The confidential, unredacted version of Samsung's Supplemental Response to
24 Apple's Corrected Reply in Support of Rule 37(b)(2) Motion re: Samsung's Alleged Violation of
25 January 27, 2012 Damages Discovery Order discusses and references the information contained in
26 the documents described in paragraphs 3-8, and should therefore be sealed for the same reasons
27 discussed above.

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I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California on April 6, 2012.

/s/ Joby Martin
Joby Martin

