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Attorneys for Plaintiff and
Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD., A
Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New York
corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company,

Defendants.

Case No. 11-cv-01846-LHK (PSG)

**DECLARATION OF
MARK D. SELWYN IN SUPPORT
OF APPLE'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

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I, Mark D. Selwyn, do hereby declare as follows:

1. I am a partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and counsel for plaintiff and counterclaim-defendant Apple Inc. (“Apple”). I am familiar with and knowledgeable about the facts stated in this declaration and if called upon could and would testify competently as to the statements made herein.

2. Apple’s Opposition to Samsung’s Motion to Exclude Opinions of Certain Apple Experts and Exhibit I to the Declaration of Mia Mazza (“Mazza Declaration”) contain information that Samsung and/or third parties have designated confidential. Specifically:

A. Exhibit I contains excerpts from the deposition of Richard L. Donaldson on May 2, 2012. This transcript was designated Highly Confidential-Attorneys' Eyes Only in accordance with the Protective Order entered in this Action by both Apple and Samsung. The deposition excerpts include a discussion of a confidential Samsung agreement.

B. The confidential, unredacted version of Apple’s Opposition to Samsung’s Motion to Exclude Opinions of Certain Apple Experts discusses and references the information contained in paragraph A above, and should therefore be sealed for the same reasons.

3. The relief requested in this motion is necessary and is narrowly tailored to protect confidential information, focusing only on the specific exhibit and specific portions of the briefs at issue.

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I declare under the penalty of perjury under the laws of the United States of America that the forgoing is true and correct to the best of my knowledge and that this Declaration was executed this 31st day of May, 2012, at Palo Alto, California.

Dated: May 31, 2012

By: /s/ Mark D. Selwyn
Mark D. Selwyn

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on May 31, 2012 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Mark D. Selwyn
Mark D. Selwyn