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

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

27 Defendants.
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CASE NO. 11-cv-01846-LHK (PSG)

**DECLARATION OF CHRISTOPHER E.
 PRICE IN SUPPORT OF SAMSUNG'S
 ADMINISTRATIVE MOTION TO FILE
 DOCUMENTS UNDER SEAL**

1 **DECLARATION OF CHRISTOPHER E. PRICE**

2 I, Christopher E. Price, declare as follows:

3 1. I am Of Counsel with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
4 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung
5 Telecommunications America, LLC (collectively, “Samsung”). I submit this declaration in
6 support of Samsung’s Administrative Motion to File Documents Under Seal. I have personal
7 knowledge of the facts set forth in this declaration, except as otherwise noted, and, if called upon
8 as a witness, I could and would testify to such facts under oath.

9 2. Exhibit 1 to this Declaration is the May 31, 2012 Second Supplemental
10 Declaration of Christopher E. Price (“Second Supplemental Price Declaration”).

11 3. Exhibit A to the Second Supplemental Price Declaration is a true and correct
12 copy of a May 31, 2012 letter from Peter J. Kolovos, counsel for Apple, to Diane C. Hutnyan,
13 counsel for Samsung. Apple has designated this letter Highly Confidential – Attorney Eyes
14 Only (“AEO”) under the protective order in this case, and Samsung expects that Apple will file a
15 declaration pursuant to Civ. L.R. 79-5(d) establishing the document as confidential, and
16 therefore it should be sealed.

17 4. Exhibit B to the Second Supplemental Price Declaration is a true and correct
18 copy of a license agreement. Apple has designated this agreement AEO under the protective
19 order in this case, and Samsung expects that Apple will file a declaration pursuant to Civ. L.R.
20 79-5(d) establishing the document as confidential, and therefore it should be sealed.

21 5. Exhibit C to the Second Supplemental Price Declaration is a true and correct
22 copy of a license agreement. Apple has designated this agreement AEO under the protective
23 order in this case, and Samsung expects that Apple will file a declaration pursuant to Civ. L.R.
24 79-5(d) establishing the document as confidential, and therefore it should be sealed.

25 6. Exhibit D to the Second Supplemental Price Declaration is a true and correct
26 copy of a license agreement. Apple has designated this agreement AEO under the protective
27 order in this case, and Samsung expects that Apple will file a declaration pursuant to Civ. L.R.
28 79-5(d) establishing the document as confidential, and therefore it should be sealed.

1 7. Exhibit E to the Second Supplemental Price Declaration is a true and correct copy
2 of a license agreement. Apple has designated this agreement AEO under the protective order in
3 this case, and Samsung expects that Apple will file a declaration pursuant to Civ. L.R. 79-5(d)
4 establishing the document as confidential, and therefore it should be sealed.

5 8. The requested relief is necessary to protect the confidentiality of information
6 contained in the Second Supplemental Price Declaration and Exhibits A-E attached thereto.

7 9. The confidential, unredacted version of the Second Supplemental Price
8 Declaration discusses and references information that Apple has designated as AEO under the
9 protective order in this case, and Samsung expects that Apple will file a declaration pursuant to
10 Civ. L.R. 79-5(d) establishing the document as confidential, and therefore it should be sealed.

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

13 Executed on May 31, 2012, at Los Angeles, California.

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Christopher E. Price

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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 Christopher Price.

/s/ Victoria Maroulis