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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
MIA MAZZA IN SUPPORT OF
APPLE'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RE APPLE'S
OPPOSITION TO SAMSUNG'S
MOTION TO STRIKE EXPERT
TESTIMONY**

1 I, Mia Mazza, do hereby declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP and counsel for
3 plaintiff and counterclaim-defendant Apple Inc. (“Apple”). I am familiar with and
4 knowledgeable about the facts stated in this declaration and if called upon could and would testify
5 competently as to the statements made herein. I submit this declaration in support of Apple’s
6 Administrative Motion to File Documents Under Seal re Apple’s Opposition to Samsung’s
7 Motion to Strike Expert Testimony (“Opposition”).

8 2. The Declaration of Marc Pernick in Support of Apple’s Opposition to Samsung’s
9 Motion to Strike Expert Testimony (“Pernick Declaration”), the Declaration of Terry L. Musika,
10 CPA in Support of Apple’s Opposition to Samsung’s Motion to Strike Expert Testimony
11 (“Musika Declaration”), and the Declaration of Dr. Michel Maharbiz in Support of Apple’s
12 Opposition to Samsung’s Motion to Strike Expert Testimony (“Maharbiz Declaration”) contain
13 information that third parties have designated confidential. Specifically:

- 14 A. Exhibit 10 to the Pernick Declaration is excerpts from the Expert Report of
15 Tony Givargis, Ph.D. Regarding Invalidity of the Asserted Claims of U.S.
16 Patent No. 7,698,711. This Report contains confidential information
17 supplied by third party Sony Ericsson in paragraphs 96 and 99. .
- 18 B. As indicated in the Wheeler Declaration, the Musika Declaration contains
19 confidential information relating to Apple licensing agreements. Due to
20 the nature of a license, these agreements also contain confidential
21 information supplied by third parties.
- 22 C. The Maharbiz Declaration and Exhibit D attached thereto contain
23 confidential information supplied by third party Atmel.
- 24 D. To the extent Apple’s Opposition and the Maharbiz and Musika
25 Declarations refer to or discuss the above-referenced materials, they
26 contain third-party confidential information and should therefore be sealed
27 for the same reasons.
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3. The relief requested in this motion is necessary and is narrowly tailored to protect confidential information, focusing only on the specific exhibits and specific portions of the briefs and declarations at issue.

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/ Mia Mazza
Mia Mazza

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Mia Mazza has concurred in this filing

/s/ Michael A. Jacobs
Michael A. Jacobs