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Filed

UNITED STATES DISTRICT COURT FEB 8 2012
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

APPLE INC., a California corporation,
Plaintiff,

v.

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

Defendants.

CV 12-00630
CASE NO

LHK

**DECLARATION OF JENNIFER J.
RHO IN SUPPORT OF APPLE INC.'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

DECLARATION OF JENNIFER J. RHO IN
SUPPORT OF APPLE INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL

1 I, Jennifer J. Rho, declare and state as follows:

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3 1. I am an associate with the firm of Gibson, Dunn & Crutcher LLP, and counsel for
4 Plaintiff Apple, Inc. ("Apple") in the above captioned action. My business address is 333 South
5 Grand Avenue, Los Angeles, California 90071-1512. I am familiar with the facts and circumstances
6 stated herein and make this declaration based on my own knowledge and would testify to the matter
7 herein under oath if called upon to do so.

8
9 2. A stipulation could not be obtained from the defendants to Apple's filing under seal
10 (1) portions of the Declaration of Arthur Rangel in support of Apple's motion for a preliminary
11 injunction including attached confidential exhibits, (2) portions of the Declaration of Christopher
12 Vellturo, Ph.D. in support of Apple's Motion for a preliminary injunction including attached
13 confidential exhibits and (3) Apple's Motion and Memorandum in Support of Apple's Motion for a
14 Preliminary Injunction that reference confidential information contained the Rangel Declaration or
15 the Vellturo Declaration because Apple's administrative motion to file documents under seal and
16 Apple's motion for a preliminary injunction were filed contemporaneously with the complaint in this
17 action and at the time of filing counsel for defendants had not made an appearance.

18
19 3. I declare under the penalty of perjury under the laws of the United States of America
20 that the forgoing is true and correct to the best of my knowledge.

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22 Dated: February 8, 2012

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24 Jennifer J. Rho

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28 DECLARATION OF JENNIFER J. RHO IN
SUPPORT OF APPLE INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL