

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

vs.

APPLE INC.,

Defendant.

JURY TRIAL DEMANDED

APPLE INC.,

Counterclaim Plaintiff,

vs.

MOTOROLA, INC., and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

**SUPPLEMENTAL DECLARATION OF CHRISTINE SAUNDERS HASKETT IN
SUPPORT OF MOTOROLA MOBILITY, INC.'S MOTION FOR LEAVE TO FILE
DOCUMENT UNDER SEAL**

I, Christine Saunders Haskett declare:

1. I am a partner with the law firm of Covington Burling LLP, counsel to Defendant and Counterclaimant Apple Inc. (“Apple”) in the above-captioned matter.

2. I make this supplemental declaration in support of Motorola Mobility, Inc.’s Motion for Leave to File Document Under Seal. I have personal knowledge of the facts set forth in this declaration, and, if called as a witness, could and would testify thereto.

3. I understand that on October 28, 2011, Motorola Mobility, Inc. (“Motorola”) filed its Notice Concerning October 28, 2011 Infringement Contentions and Motion for Deadline For Final Infringement Contentions and Incorporated Memorandum of Law In Support (“Notice and Motion”), attached thereto as “Exhibit A.”

3. I understand that Motorola’s Notice and Motion cite to certain Apple documents, including:

745Apple11543563

745Apple0783686-786

745Apple4699474-569

745Apple4857865-99

745Apple10360097-98

745Apple5374978-81

745Apple10362501-32

745Apple8563808-27

745Apple5375102-04

4. These documents have been designated as containing “APPLE CONFIDENTIAL BUSINESS INFORMATION” by Apple under the Stipulated Protective Order entered into by the parties and approved by this Court on March 21, 2011, as confidential and subject to be filed under seal. D.E. 69.

5. Among other things, these documents include information relating to Apple’s iTunes and App Store authentication system, Apple’s MobileMe service, and the antenna of Apple’s iPhone 4. They include information relating to the architecture, interfaces, design, and software of Apple products, and other competitively sensitive information that Apple holds in confidence. It is my understanding that disclosure of this information could harm Apple by providing its competitors with sensitive information about Apple’s business and products, which competitors could use to gain an unfair advantage.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on November 7, 2011 at San Francisco, California.

/s/ Christine Saunders Haskett

Christine Saunders Haskett

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2011, I filed the foregoing document with the Clerk of the Court. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List via email and CM/ECF.

/s/ Christopher R.J. Pace
Christopher R.J. Pace (Fla. Bar No. 0721166)

SERVICE LIST
Case No. 1:10cv023580-Civ-UU

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