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9 Attorneys for Plaintiff and  
10 Counterclaim-Defendant APPLE INC.

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION

14  
15 APPLE INC., a California corporation,  
16 Plaintiff,

17 v.

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

21 Defendants.  
22

Case No. 11-cv-01846-LHK

**DECLARATION OF CYNDI WHEELER  
REGARDING SAMSUNG'S  
ADMINISTRATIVE MOTIONS TO FILE  
DOCUMENTS UNDER SEAL**

1 I, Cyndi Wheeler, hereby declare as follows:

2 1. I am an attorney for Apple Inc. (“Apple”). I submit this declaration regarding  
3 Samsung’s Administrative Motions to File Documents Under Seal filed on July 8, 2013 (Dkt.  
4 Nos. 2333, 2338). I have personal knowledge of the matters set forth below. If called as a  
5 witness I could and would competently testify as follows.

6 2. Samsung stated that Exhibit 1 to its Motion for Leave to File Three-Page Reply in  
7 Support of Samsung’s Administrative Motion for Relief from April 29, 2013 Case Management  
8 Order, or Alternatively, for a Hearing contains Apple-confidential information. (Dkt. No. 2333.)  
9 Samsung further stated that Exhibit 6 to the Declaration of Robert J. Becher in Support of  
10 Samsung’s Motion for New Trial Regarding ‘381 Patent Pursuant to Fed. R. Civ. P. 59 contains  
11 Apple-confidential information. (Dkt. Nos. 2338, 2338-1.) Apple does not maintain a claim of  
12 confidentiality with respect to these documents.

13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing is true and correct. Executed this 15th day of July, 2013 at Cupertino, California.

15  
16 /s/ Cyndi Wheeler  
17 Cyndi Wheeler

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**ATTESTATION OF E-FILED SIGNATURE**

I, Erik J. Olson, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Cyndi Wheeler has concurred in this filing.

Dated: July 15, 2013

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*/s/ Erik J. Olson*  
Erik J. Olson