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

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
24 Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New
25 York corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA,
26 LLC, a Delaware limited liability company,

27 Defendants.

CASE NO. 12-CV-00630-LHK

**DECLARATION OF BILL TRAC IN
SUPPORT OF SAMSUNG'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL**

1 I, Bill Trac, declare:

2 1. I am a member of the State Bar of California, admitted to practice before this
3 Court, and an associate at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for
4 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
5 Telecommunications America, LLC (collectively, "Samsung"). I make this declaration of
6 personal knowledge, and if called and sworn as a witness, I could and would testify as set forth
7 below.

8 2. Exhibits 4, 7, and 8 to the Declaration of Todd Briggs in Support of Samsung's
9 Reply to Its Motion for Leave to Amend and Supplement Its Infringement Contentions ("Briggs
10 Declaration") contain information that has been designated HIGHLY CONFIDENTIAL –
11 ATTORNEYS' EYES ONLY by Apple under the Agreed Upon Protective Order Regarding
12 Disclosure and Use of Discovery Materials ("Protective Order"). Exhibit 5 to the Briggs
13 Declaration contains information that has been designated INTEL CONFIDENTIAL –
14 ATTORNEYS' EYES ONLY by Intel under the Protective Order and the Stipulated Amendment
15 to the Protective Order Regarding Intel Code Production. Exhibit 6 to the Briggs Declaration
16 contains information that has been designated HIGHLY CONFIDENTIAL – ATTORNEYS'
17 EYES ONLY by Alcatel-Lucent under the Protective Order. Pursuant to L.R. 79-5 and General
18 Order No. 62, a copy of the unredacted version of Exhibits 6-10 has been lodged with the Court
19 for in camera review and served on all parties.

20 3. Portions of Samsung's Reply in Support of Samsung's Motion for Leave to Amend
21 and Supplement Its Infringement Contentions ("Reply Brief") discuss and refer to non-public
22 documents and information contained in the aforementioned exhibits. Pursuant to L.R. 79-5 and
23 General Order No. 62, a copy of the unredacted version of Samsung's Reply Brief has been lodged
24 with the Court for in camera review and served on all parties.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed on May 21, 2013 at Redwood Shores, California.

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4 */s/ Bill Trac*
5 Bill Trac
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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 Civil L.R. 5-1 that concurrence in the electronic filing of this document has been obtained from Bill Trac.

/s/ Victoria F. Maroulis

Victoria F. Maroulis