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13 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
14 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
18

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

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

25 Defendant.
26

CASE NO. 11-cv-01846-LHK

**DECLARATION OF VICTORIA F.
MAROULIS IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL**

1 I, Victoria F. Maroulis, declare:

2 1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP,
3 counsel for Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung
4 Telecommunications America, LLC (collectively "Samsung"). I am a member of the State Bar of
5 California and admitted to practice before this Court. I have personal knowledge of the facts set
6 forth in this declaration and, if called upon as a witness, I could and would testify to such facts
7 under oath.

8 2. I make this declaration in support of Samsung's Administrative Motion to File
9 Documents Under Temporary Seal Until The Jury Completes Its Deliberations.

10 3. During court proceedings on the morning of August 21, 2012, the Court told the
11 parties to delay filing the proffers of testimony and documents that had been excluded during the
12 course of trial.

13 4. During court proceedings in the afternoon of August 21, 2012, Samsung requested
14 and was granted permission by the Court to file the proffers of testimony and documents that had
15 been excluded during the course of trial under seal until the jury deliberations are complete.

16 5. Samsung's Proffer of Witness Testimony and Exhibits either discusses or attaches
17 the excluded evidence. Pursuant to the Court's grant of permission to file under seal, Samsung's
18 Proffer of Witness Testimony and Exhibits should be temporarily sealed.

19 6. The Declaration of Diane Hutnyan in Support of Samsung's Proffer of Witness
20 Testimony and Exhibits either discusses or attaches the excluded evidence. Pursuant to the
21 Court's grant of permission to file under seal, the Declaration of Diane Hutnyan in Support of
22 Samsung's Proffer of Witness Testimony and Exhibits should be temporarily sealed.

23 7. The Declaration of Brett Arnold in Support of Samsung's Proffer of Witness
24 Testimony and Exhibits either discuss or attach the excluded evidence. Pursuant to the Court's
25 grant of permission to file seal, the Declaration of Brett Arnold in Support of Samsung's Proffer of
26 Witness Testimony and Exhibits should be temporarily sealed.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
2 Jose, California on August 21, 2012.

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4 /s/ Victoria F. Maroulis

5 Victoria F. Maroulis
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