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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.
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CASE NO. 11-cv-01846-LHK

**DECLARATION OF PRASHANTH
CHENNAKESAVAN**

1 I, Prashanth Chennakesavan, declare:

2 1. I am an associate 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 Seal.

10 3. Exhibit 2 to the Declaration of Diane Hutnyan in Support of Samsung’s Proffer of
11 Witness Testimony and Exhibits consists of excerpts from the reproductions of Samsung’s
12 confidential source code. Pursuant to the Court’s guidance that “compelling reasons” exist to seal
13 reproductions of confidential source code, Exhibit 2 should be sealed. (*See* Dkt. No. 1649 at 8,
14 17.)

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17 I declare under penalty of perjury that the foregoing is true and correct. Executed in Los
18 Angeles, California on August 21, 2012.

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/s/ Prashanth Chennakesavan
Prashanth Chennakesavan

GENERAL ORDER 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 General Order 45.X.B. that concurrence in the electronic filing of this document has been obtained from Prashanth Chennakesavan.

/s/ Victoria Maroulis

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