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INTEL CORPORATION  
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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN JOSE DIVISION  
11

12 APPLE INC.,

13 Plaintiff,

14 v.

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

19 Defendants.

Case No. 11-cv-01846-LHK

**DECLARATION OF CHRISTOPHER  
KELLEY IN SUPPORT OF SAMSUNG'S  
MOTION TO SEAL EXHIBIT 87**

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21 I, Christopher Kelley, do declare as follows:

22 1. I am an attorney licensed to practice law in the state of California and admitted to  
23 practice before the Northern District. I have personal knowledge of the facts set forth in this  
24 declaration and, if called upon, I could and would testify to such facts under oath.

25 2. I represent Intel Corp. in connection with this matter.

26 3. This declaration is made in support of a motion by Samsung. In its motion,  
27 Samsung requests that the Court seal pages contained in Exhibit 87 to Samsung's Notice of Filing  
28 of Excluded Exhibits [Dkt. #1898-1]. Exhibit 87 includes two pages of Intel confidential material

1 and this declaration is made in support of the request to seal those pages.

2 4. The Intel confidential material is contained in the second and third pages from  
3 Exhibit 87, which Samsung sought to introduce at trial as demonstratives 3966.105 and 3966.106.  
4 The second page [3966.105] and third page [3966.106] of Exhibit 87 contain portions of two  
5 different block diagrams from Intel's X-GOLD 61x Product Specification [593DOC002961 –  
6 4487]. These block diagrams illustrate confidential aspects of the design of Intel's X-GOLD 61x  
7 product. The Court has already determined that there is compelling reason to seal the material in  
8 the X-GOLD 61x Product Specification. See August 9 Order [Dkt # 1649] at 10, September 7  
9 Order [Dkt # 1959] at 2, September 14 Order [Dkt # 1966] at 7.

10 5. Attached as Exhibit 1 to this declaration is a copy of declaration made by Intel  
11 Mobile Communications division Vice-President Josef Hausner, describing the highly sensitive  
12 nature of the material contained within the X-GOLD 61x Product Specification.

13 6. For the reasons provided in the Court's orders and in Josef Hausner's declaration,  
14 Intel requests that the Court order the redaction of the Exhibit 87 to exclude the second and third  
15 pages from public versions of this document. A version of Samsung's Exhibit 87 which has been  
16 redacted in this manner is attached as Exhibit 2 to this declaration.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed in Palo  
18 Alto, California on September 20, 2012.

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21 /s/ Christopher L. Kelley  
22 Christopher L. Kelley  
23 *Counsel for Non-Party Intel Corporation*  
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