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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION
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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 Defendants.
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Case No. 11-cv-01846-LHK

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

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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 material contained in Exhibit FF to the Declaration of Diane
28 Hutnyan in Support of Samsung's Objections and Responses (ECF # 1682-5). Exhibit FF

1 includes a short passage on page 19 referring to specific circuit registers incorporated within
2 Intel's semiconductor devices.

3 4. The fact that certain functions are implemented in circuit hardware as opposed to
4 firmware is a system engineering decision that Intel has a legitimate interest in protecting from
5 public disclosure. The Court has already determined that there is compelling reason to protect
6 specific implementation details of this sort from public disclosure. See August 9 Order (ECF #
7 1649) at 27-28.

8 5. Intel therefore requests that the Court order the redaction of the Exhibit FF to
9 exclude the specific passages pertaining to circuit hardware from public versions of this
10 document. A version of Exhibit FF which has been redacted in this manner is attached as Exhibit
11 1 to this declaration.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed in
13 Sacramento, California on September 21, 2012.

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16 /s/ Christopher L. Kelley
17 Christopher L. Kelley
18 Counsel for Non-Party Intel Corporation
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