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

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
20

21 APPLE INC., a California corporation,

22 Plaintiff,

23 vs.

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

27 Defendants.  
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CASE NO. 11-cv-01846-LHK (PSG)

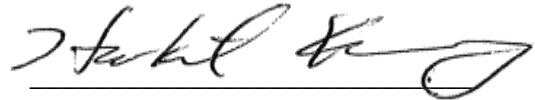
**DECLARATION OF HANKIL KANG**

1 I, Hankil Kang, declare:

2 1. I am Legal Counsel at Samsung Electronics Co., Ltd. ("SEC"). I submit this  
3 declaration in support of Samsung's Administrative Motion to File Documents Under Seal, filed  
4 by SEC, Samsung Electronics America, Inc. ("SEA") and Samsung Telecommunications  
5 America, LLC ("STA") (collectively, "Samsung"). I have personal knowledge of the facts set  
6 forth in this declaration, except as otherwise noted, and, if called as a witness, could and would  
7 testify to those facts under oath.

8 2. The portions of Samsung's Motion to Compel Depositions of Apple Reply Expert  
9 Declarants that Samsung requests be sealed contain detailed, highly-sensitive descriptions of the  
10 operation of Samsung's source code. Disclosure of this information is likely to cause harm to  
11 Samsung as competitors could use the descriptions to re-create the features included in Samsung's  
12 products.

13  
14 I declare under penalty of perjury under the laws of the United States of America that the  
15 foregoing is true and correct. Executed in Suwon, South Korea on November 15, 2012.

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17  
18 Hankil Kang

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