

1 DAVID S. BLOCH (SBN: 184530)
dbloch@winston.com
2 JENNIFER A. GOLINVEAUX (SBN: 203056)
jgolinveaux@winston.com
3 MARCUS T. HALL (SBN: 206495)
mthall@winston.com
4 WINSTON & STRAWN LLP
101 California Street
5 San Francisco, CA 94111-5894
Telephone: (415) 591-1000
6 Facsimile: (415) 591-1400

7 PETER J. CHASSMAN (*pro hac vice* application forthcoming)
pchassman@winston.com
8 WINSTON & STRAWN LLP
1111 Louisiana, 25th Floor
9 Houston, TX 77002-5242
Telephone: (713) 651-2623
10 Facsimile: (713) 651-2700

11 Attorneys for Non-Party,
12 MOTOROLA MOBILITY LLC

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN JOSE DIVISION

16 APPLE, INC., a California Corporation,

17 Plaintiff,

18 v.

19 SAMSUNG ELECTRONICS CO., LTD., a
20 Korean corporation; SAMSUNG
21 ELECTRONICS AMERICA, INC., a New York
22 corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC, a
Delaware limited liability company,

23 Defendants.

CASE NO.: 11-CV-01846-LHK

DECLARATION OF
JENNIFER A. GOLINVEAUX IN
SUPPORT OF EMERGENCY
MOTION BY NONPARTY
MOTOROLA MOBILITY LLC TO
SEAL EXHIBITS, CLOSE
COURTROOM, AND SEAL
PORTIONS OF TRANSCRIPT

[Civ. L.R. 79-5]

Date: Expedited Request
Courtroom: 8, 4th Floor
Judge: Hon. Lucy H. Koh

DECLARATION OF JENNIFER A. GOLINVEAUX

I, Jennifer A. Golinveaux, declare and state:

1. I am an attorney at law and a partner at Winston & Strawn LLP, counsel for nonparty Motorola Mobility LLC ("Motorola"). I submit this declaration in support of Emergency Motion By Non-Party Motorola Mobility LLC To Seal Exhibits, Close Courtroom, And Seal Portions Of Transcript ("Motorola's Motion to Seal"). I have personal knowledge of the matters set forth herein, and if called as a witness, could and would competently testify thereto.

2. Attached hereto as Exhibit 1 is a proposed redacted version of the Motorola confidential information excerpted by Samsung as contained in proposed Samsung Trial Exhibits 77, 630, and 631. The portions that Motorola requests to be sealed are outlined in blue.

3. Attached hereto as Exhibit 2 is a proposed redacted version of proposed Samsung Trial Exhibit 82. The portions that Motorola requests to be sealed appear on pages 13-15, 17, and 19 (Bates S-794-ITC-005280731 to S-794-ITC-005280733, S-794-ITC-005280735, and S-794-ITC-005280737) and are outlined in blue.

4. Exhibit A, Appendix A to the concurrently submitted Declaration of Thomas V. Miller contains redacted public versions of Exhibits 1 and 2.

5. Pursuant to Civ. L.R. 7-11, on July 26, 2012, counsel for Motorola attempted to obtain a stipulation from parties to this action Apple and Samsung, and Third Party Intervenor Reuters America to the relief sought in Motorola's Motion to Seal. Samsung has indicated that it does not oppose Motorola's Motion to Seal. Counsel for Reuters America has responded that he is still checking with his client but that Motorola should assume that Reuters will not stipulate to sealing or closing the courtroom. Apple has not responded to Motorola's request as of the filing of this declaration.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 26th day of July, 2012, in San Francisco, California.


Jennifer A. Golinveaux

EXHIBIT 1 – REDACTED
LODGED WITH THE CLERK

**PROPOSED REDACTED VERSION OF THE
MOTOROLA CONFIDENTIAL INFORMATION
EXCERPTED BY SAMSUNG AS CONTAINED
IN PROPOSED TRIAL EXHIBITS 77, 630, AND
631**

EXHIBIT 2 – REDACTED
LODGED WITH THE CLERK

**PROPOSED REDACTED VERSION OF
MOTOROLA CONFIDENTIAL INFORMATION
CONTAINED IN PROPOSED TRIAL EXHIBIT 82**