

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

ARENDI S.A.R.L.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 13-919-JLH

**DECLARATION OF CHEOLWOO AHN IN SUPPORT OF NON-PARTIES  
SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS  
AMERICA, INC.'S UNOPPOSED MOTION TO SEAL  
PORTIONS OF THE TRIAL TRANSCRIPTS AND EXHIBITS**

I, Cheolwoo Ahn, hereby declare as follows:

1. My name is Cheolwoo Ahn.
2. I am over the age of 18, of sound mind, and competent to testify.
3. I am an employee of Samsung Electronics Co., Ltd. ("Samsung") in Seoul, South Korea. I have worked at Samsung since 2001. My current title is Principal Engineer.
4. My responsibilities include the negotiation and agreement of licensing agreements related to patents and other intellectual property. I have been involved in several patent licensing negotiations and continue to be involved in such activities on behalf of Samsung.
5. I have reviewed the Settlement and Patent License Agreement (the "Samsung-Arendi Agreement") between Samsung and Arendi S.A.R.L. ("Arendi"). I understand that it is marked as Exhibit PX-77 in the above-captioned case.
6. The Samsung-Arendi Agreement contains highly confidential business information including financial terms and competitive materials, such that Samsung would be

competitively disadvantaged from its disclosure. This information is not available to the public, and Section 8.2 of the Samsung-Arendi Agreement expressly states that its contents are to remain confidential.

7. In the ordinary course of business, Samsung expends significant resources to maintain documents such as the Samsung-Arendi Agreement securely and confidentially on secure computer systems that are not accessible to the public or third parties.

8. Samsung has an interest in keeping the information in the Samsung-Arendi Agreement confidential, at least because that information relates to the terms on which it is willing to settle litigation, and it would be seriously harmed if the information were disclosed to the public. Disclosure of the information in the Samsung Agreement would irreversibly harm Samsung as it would impair Samsung's ability to negotiate future favorable settlements and patent licenses and would make future litigants and/or licensors aware of the terms on which Samsung previously agreed to settlement and licensing to Samsung's detriment.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: August 10, 2023



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CHEOLWOO AHN  
Principal Engineer  
Samsung Electronics Co., Ltd.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 14, 2023, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

**BY EMAIL**

SMITH, KATZENSTEIN & JENKINS LLP  
Neal C. Belgam (No. 2721)  
Daniel Taylor (No. 6934)  
1000 West Street, Suite 1501  
Wilmington, DE 19801  
(302) 652-8400  
*nbelgam@skjlaw.com*  
*dtaylor@skjlaw.com*

SUSMAN GODFREY LLP  
Seth Ard  
Max Straus  
Beatrice Franklin  
1301 Avenue of the Americas, 32nd Floor  
New York, New York 10019  
Tel: (212) 336-8330  
*sard@susmangodfrey.com*  
*mstraus@susmangodfrey.com*  
*bfranklin@susmangodfrey.com*

John Lahad  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002-5096  
*jlahad@susmangodfrey.com*

Kalpana Srinivasan  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
*ksrinivasan@susmangodfrey.com*

Kemper Diehl  
401 Union Street, Suite 3000  
Seattle, WA 98101-3000  
*kdiehl@susmangodfrey.com*

*Attorneys for Plaintiff Arendi S.A.R.L.*

David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Andrew L. Brown (#6766)  
POTTER ANDERSON & CORROON LLP  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
*dmoore@potteranderson.com*  
*bpalapura@potteranderson.com*  
*abrown@potteranderson.com*

Robert W. Unikel  
John Cotiguala  
PAUL HASTINGS LLP  
71 South Wacker Drive, Suite 4500  
Chicago, IL 60606  
*robertunikel@paulhastings.com*  
*johncotiguala@paulhastings.com*

Robert R. Laurenzi  
Chad J. Peterman  
PAUL HASTINGS LLP  
200 Park Avenue  
New York, NY 10166  
*robertlaurenzi@paulhastings.com*  
*chadpeterman@paulhastings.com*

Ginger D. Anders  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue NW, Suite 500E  
Washington, D.C. 20001  
*Ginger.Anders@mto.com*

Vincent Y. Ling  
MUNGER, TOLLES & OLSON LLP  
350 S. Grand Avenue, 50th Floor  
Los Angeles, CA 90071

*vincent.ling@mto.com*

*Attorneys for Defendant Google LLC*

*/s/Adam W. Poff*

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YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

Adam W. Poff (No. 3990)

Samantha G. Wilson (No. 5816)

1000 North King Street

Wilmington, DE 19801

(302) 571-6600

apoff@ycst.com

swilson@ycst.com

*Attorneys for Non-Parties Samsung  
Electronics Co., Ltd. and Samsung Electronics  
America, Inc.*