

# EXHIBIT 11

3:18-cv-00360-WHA  
Docket Number 168-15  
SEALED

**JACOBS DECLARATION  
EXHIBIT M**

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

UNILOC 2017 LLC; and UNILOC  
LUXEMBOURG, S.A.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case Nos. **3:18-cv-00360-WHA**  
**3:18-cv-00363-WHA**  
**3:18-cv-00365-WHA**  
**3:18-cv-00572-WHA**

**DECLARATION OF [REDACTED]**

I, [REDACTED], hereby declare as follows:

1. My name is [REDACTED]. I am over eighteen years of age and I am competent to testify about the matters in this declaration. I have personal knowledge of the nature of [REDACTED] [REDACTED], whose principal place of business is [REDACTED] [REDACTED] confidential and proprietary information and trade secrets which includes the material terms contained in a certain Uniloc document which references [REDACTED] name, the date of its Settlement, Release, and License Agreement with Uniloc and the amount paid under the same (the "Uniloc Document"). It is [REDACTED] understanding that this Uniloc Document is referenced in an Exhibit currently filed under seal in the above captioned matter.

2. I am the Chief Financial Officer for [REDACTED].

3. The parties to the Uniloc Document consider the terms of the same to be confidential, proprietary, and trade secret information and have designated the Uniloc Document "RESTRICTED-ATTORNEYS EYES ONLY" or higher confidentiality designation during the course of any litigation.

1           4.       Based on what I have been told about the Uniloc Document, the Uniloc Document  
2 contains information not publicly available. Specifically, [REDACTED] is a privately held company and  
3 the Uniloc Document contains sensitive, confidential, proprietary information related to financial data  
4 and licensing terms, the disclosure of which would cause [REDACTED] competitive harm. For example,  
5 disclosure of the amount paid under the Uniloc Document would create difficulties for [REDACTED] in  
6 future license negotiations. In addition, even being identified as a party to the Uniloc Document may  
7 result in [REDACTED] being a target of future patent litigation.

9           5.       The information sought to remain under seal, that being all information contained in  
10 the Uniloc Document including, specifically, [REDACTED] name, the date of the Uniloc Document  
11 and the amount paid under the same (collectively “[REDACTED] Confidential, Proprietary, and Trade  
12 Secret Information”), qualifies for protection under Federal Rule of Civil Procedure 26 (c)(1)(G), and  
13 disclosure of any of this extremely sensitive information would create a substantial risk of harm to  
14 [REDACTED]. As such, [REDACTED] request to treat all information contained in the Uniloc Document  
15 as sensitive, confidential, proprietary, trade secret information including, specifically, [REDACTED]  
16 Confidential, Proprietary, and Trade Secret Information, and not be publicly disclosed and remain  
17 under seal, is narrowly tailored to protect [REDACTED] confidential business information.

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21           I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct.

23  
24           Executed on February 14, 2019 at [REDACTED].

25  
26 [REDACTED]  
27           Chief Financial Officer of  
28 [REDACTED]