

EXHIBIT 12

3:18-cv-00360-WHA
Docket Number 168-16
SEALED

**JACOBS DECLARATION
EXHIBIT N**

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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]

1 I, [REDACTED], hereby declare as follows:

2 1. I am the Vice President, General Counsel of [REDACTED]

3 2. I am over 18 years of age and competent to make this declaration. If called to testify
4 as a witness in this matter, I could and would testify truthfully to each of the statements in this
5 declaration.

6 3. On or about [REDACTED] Uniloc Luxembourg S.A. and Uniloc USA, Inc.
7 (collectively “Uniloc”) and [REDACTED] entered into a Confidential Settlement and Patent License
8 Agreement (“Confidential License”).

9 4. [REDACTED] considers each of: 1) the identity of [REDACTED] as a licensee of certain Uniloc
10 patents; 2) the date of the Confidential License; and 3) the amount paid by [REDACTED] to Uniloc under
11 the terms of the Confidential License confidential financial and business information, the disclosure
12 of which would cause [REDACTED] competitive harm. For example, [REDACTED] believes the disclosure of
13 the above-identified pieces of information would cause [REDACTED] competitive and financial harm by
14 making it a target in future patent litigation campaigns by non-practicing entities. Additionally,
15 [REDACTED] believes the disclosure of the amount paid by [REDACTED] to Uniloc under the terms of the
16 Confidential License would both disadvantage and create difficulties for [REDACTED] in future patent
17 license negotiations. For at least these reasons, [REDACTED] believes each of the above-identified
18 pieces of information qualifies for protection under Federal Rule of Civil Procedure 26(c) because
19 the disclosure of this extremely sensitive information would create a substantial risk of serious harm
20 to [REDACTED].

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

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25 Executed on February, 13, 2019 at [REDACTED]

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