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14 AMERICA, INC. and SAMSUNG
   TELECOMMUNICATIONS AMERICA, LLC

15

16   UNITED STATES DISTRICT COURT

17   NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 | APPLE INC., a California corporation, | CASE NO. 11-cv-01846-LHK

19 | Plaintiff, | **SAMSUNG'S ADMINISTRATIVE
   | | MOTION TO FILE DOCUMENTS
20 | vs. | UNDER SEAL**

21 | SAMSUNG ELECTRONICS CO., LTD., a
   | Korean business entity; SAMSUNG
22 | ELECTRONICS AMERICA, INC., a New
   | York corporation; SAMSUNG
23 | TELECOMMUNICATIONS AMERICA,
   | LLC, a Delaware limited liability company,
24
   | Defendants.
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02198.51845/4784106.1
                                                           Case No. 11-cv-01846-LHK
          SAMSUNG'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL

1   Pursuant to Civil L.R. 7-11 and 79-5, and General Order No. 62, Defendants Samsung

2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications

3 America, LLC (collectively, "Samsung") hereby bring this administrative motion for an order to

4 seal the following:

5   1.   The confidential, unredacted version of Samsung's Opposition to Apple's Motion

6   For Summary Judgment of Non-Infringement of U.S. Patent Number 7,362,867

7   and Invalidity of U.S. Patent Numbers 7,456,893 and 7,577,460;

8   2.   The confidential, unredacted version of the Declaration of Richard D. Wesel, Ph.D.

9   in Support of Samsung's Opposition to Apple Apple's Motion For Summary

10   Judgment of Non-Infringement of U.S. Patent Number 7,362,867 and Invalidity of

11   U.S. Patent Numbers 7,456,893 and 7,577,460;

12   3.   Exhibits I-K and M-O to the Wesel Declaration.

13   The above documents discuss, refer to, or comprise excerpts of documents or other

14 information that Samsung or Apple have designated as HIGHLY CONFIDENTIAL –

15 ATTORNEYS' EYES ONLY under the Protective Order.   Intel Corporation has designated

16 Exhibits I, J, K, N, and O to the Wesel Declaration HIGHLY CONFIDENTIAL – ATTORNEYS'

17 EYES ONLY.   Apple has designated Exhibit M to the Wesel Declaration HIGHLY

18 CONFIDENTIAL – ATTORNEYS' EYES ONLY.   Samsung expects that Apple will file a

19 declaration pursuant to Civil L.R. 79-5(d) establishing good cause to seal these documents.

20 Samsung has established good cause to permit filing items 1, 2 and 3 under seal through the

21 Declaration of Ketan Patel in Support of Samsung's Administrative Motion to File Documents

22 Under Seal, filed herewith.

23   Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court

24 for *in camera* review and served on all parties.   Proposed redacted versions of items 1 and 2 have

25 been filed concurrently with this motion.

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1   DATED: May 31, 2012   QUINN EMANUEL URQUHART &
                                            SULLIVAN, LLP
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4   By */s/ Victoria Maroulis*
                                                Charles K. Verhoeven
5   Kevin P.B. Johnson
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6   Michael T. Zeller

7
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8   LTD., SAMSUNG ELECTRONICS AMERICA,
                                                INC., and SAMSUNG
9   TELECOMMUNICATIONS AMERICA, LLC

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