

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Charles K. Verhoeven (Cal. Bar No. 170151)  
 2 charlesverhoeven@quinnemanuel.com  
 50 California Street, 22<sup>nd</sup> Floor  
 3 San Francisco, California 94111  
 Telephone: (415) 875-6600  
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
 kevinjohnson@quinnemanuel.com  
 6 Victoria F. Maroulis (Cal. Bar No. 202603)  
 victoriamaroulis@quinnemanuel.com  
 7 555 Twin Dolphin Drive 5<sup>th</sup> Floor  
 Redwood Shores, California 94065  
 8 Telephone: (650) 801-5000  
 Facsimile: (650) 801-5100

9 Edward DeFranco (Cal. Bar No.165596)  
 10 eddefranco@quinnemanuel.com  
 51 Madison Avenue, 22nd Floor  
 11 New York, New York 10010  
 Telephone: (212) 849-7000  
 12 Facsimile: (212) 849-7100

13 Michael T. Zeller (Cal. Bar No. 196417)  
 michaelzeller@quinnemanuel.com  
 14 865 S. Figueroa St., 10th Floor  
 Los Angeles, California 90017  
 15 Telephone: (213) 443-3000  
 Facsimile: (213) 443-3100

16 Attorneys for Samsung Electronics America, Inc.  
 17 and Samsung Telecommunications America LLC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,  
 21  
 Plaintiff,  
 22  
 vs.  
 23  
 24 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean business entity; SAMSUNG  
 ELECTRONICS AMERICA, INC., a New  
 25 York corporation; SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 26 LLC, a Delaware limited liability company,  
 27  
 Defendants.

CASE NO. 11-cv-01846-LHK  
**SAMSUNG’S ADMINISTRATIVE  
 MOTION TO FILE DOCUMENTS  
 UNDER SEAL**  
  
**Date: August 18, 2011**  
**Time: 1:30 pm**  
**Place: Courtroom 4, 5th Floor**  
**Judge: Hon. Lucy H. Koh**

1 Pursuant to Civil L.R. 79-5 and 7-11, and General Order No. 62, Samsung Electronics  
2 America, Inc. (“SEA”) and Samsung Telecommunications America, LLC (“STA”) (collectively  
3 “Samsung”) hereby bring this administrative motion for a sealing order to seal the Declaration of  
4 Eunha Kim In Support of Samsung’s Motion to Disqualify Bridges & Mavrakakis LLP and  
5 attached Exhibits 1-3 (the “Kim Declaration”).

6 Samsung has established good cause to permit filing this information under seal through  
7 the Declaration of Eunha Kim in Support of Samsung’s Administrative Motion to File Documents  
8 Under Seal (the “Kim Administrative Declaration”), filed contemporaneously herewith. The Kim  
9 Declaration as well as the attached Exhibits 1-3, contain detailed information regarding past  
10 Samsung litigation and strategy as well as detailed billing records submitted by the attorneys from  
11 Bridges & Mavrakakis while they were at Kirkland & Ellis, LLP. (“Kim Administrative  
12 Declaration” at ¶ 3.) The declaration contains detailed descriptions of the tasks and strategies  
13 undertaken by the former Kirkland & Ellis attorneys while representing Samsung. (Id.) This type  
14 of detailed litigation strategy information is treated as highly confidential by Samsung and its  
15 disclosure would harm future litigations. (Id.) Additionally, the billing records contain detailed  
16 information regarding the tasks performed by the attorneys that would reveal highly confidential  
17 information on how Samsung litigates claims of patent infringement. (Id.) In fact, it is precisely  
18 this type of information that Samsung is concerned will be disclosed by attorneys at Bridges &  
19 Mavrakakis if they are not disqualified as counsel for Apple.

20 Accordingly, Samsung respectfully requests that the Court order that the Kim Declaration  
21 and Exhibits 1-3 to the Kim Declaration be filed under seal.  
22  
23  
24  
25  
26  
27  
28

1 DATED: July 11, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By /s/ Victoria F. Maroulis  
Charles K. Verhoeven  
Kevin P.B. Johnson  
Victoria F. Maroulis  
Edward DeFranco  
Michael T. Zeller  
Attorneys for SAMSUNG ELECTRONICS  
AMERICA, INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC