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 CO., LTD., SAMSUNG ELECTRONICS
 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,
 19 Plaintiff,
 20 vs.
 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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CASE NO. 11-cv-01846-LHK
**SAMSUNG'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

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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:

- 5 1. The confidential, unredacted version of Samsung's Reply in Support of Motion to
6 Strike Expert Testimony Based on Undisclosed Facts and Theories (“Reply”);
- 7 2. The confidential, unredacted version of the Declaration of Michael J. Wagner in
8 Support of the Reply (“Wagner Declaration”);
- 9 3. Exhibits B and C to the Wagner Declaration; and
- 10 4. Exhibits 1-6, 13, 20-21, and 29-30 to the Declaration of Christopher E. Price in
11 Support of the Reply (“Price Declaration”).

12 In short, the above documents discuss, refer to, or comprise information the parties have
13 designated as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY. The Reply; Wagner
14 Declaration; Exhibit C to the Wagner Declaration; and Exhibits 1-6, 13, 20-21, and 29-30 to the
15 Price Declaration discuss, refer to, or comprise documents Apple Inc. (“Apple”) has designated as
16 confidential. Exhibit B to the Wagner Declaration discusses information both Apple and
17 Samsung have designated as confidential. Samsung has established good cause to seal Exhibit B
18 to the Wagner Declaration through the Declaration of Joby Martin in Support of Samsung’s
19 Administrative Motion to File Documents Under Seal. Samsung expects that Apple will file the
20 declaration required by Local Rule 79-5(d) to permit the sealing of the Reply; Wagner
21 Declaration; Exhibits B and C to the Wagner Declaration; and Exhibits 1-6, 13, 20-21, and 29-30
22 to the Price Declaration.

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.

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DATED: June 7, 2012

QUINN EMANUEL URQUHART &
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