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13 Attorneys for SAMSUNG ELECTRONICS
 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.
 25

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 Exclude Opinions of Certain of Apple's Experts; and
- 7 2. Exhibits 1 and 4 – 7 to the Reply Declaration of Joby Martin In Support of
8 Samsung's Motion To Exclude Opinions of Certain of Apple's Experts ("Martin
9 Declaration").

10 In short, the above documents discuss, refer to, or comprise interrogatory objections and
11 responses that the parties have designated as HIGHLY CONFIDENTIAL — ATTORNEYS'
12 EYES ONLY. Exhibits 1 and 4 – 7 to the Martin Declaration are documents which Apple has
13 designated as confidential. Samsung expects that Apple will file the declaration require by Local
14 Rule 79-5(d) to establish these documents as sealable.

15 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court
16 for *in camera* review and served on all parties.

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19 DATED: June 7, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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22 By /s/ Victoria Maroulis

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LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

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