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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.
 25

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 Reply in Support of Motion for
6 Summary Judgment (“the Motion”);
- 7 2. The confidential, unredacted version of the Declaration of Bill Trac in Support of
8 the Motion;
- 9 3. Exhibits 8-10, 14-18, 23, and 25-27 to the Declaration of Bill Trac in Support of
10 the Motion;
- 11 4. The confidential, unredacted version of the Supplemental Declaration of Adam
12 Bogue;
- 13 5. Exhibits 1-3 to the Supplemental Declaration of Adam Bogue;

14 In short, the above documents discuss, refer to, or comprise excerpts of documents that
15 Samsung or Apple have designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES
16 ONLY under the Protective Order. Samsung has established good cause to permit filing these
17 documents under seal through the Declaration of Bill Trac in Support of Samsung’s
18 Administrative Motion to File Documents Under Seal, filed herewith. Samsung further expects
19 Apple to file a declaration under Local Rule 79-5(d) establishing good cause for filing documents
20 it has marked confidential.

21 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
22 for *in camera* review and served on all parties. A proposed redacted version of Samsung’s
23 Motion for Summary Judgment has been filed concurrently with this motion.

1 DATED: June 7, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria Maroulis

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