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 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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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 the Declaration of Brian von Herzen in
6 Support of Samsung's Reply in Support of Motion to Strike Expert Testimony
7 Based on Undisclosed Facts and Theories ("von Herzen Dec."); and
- 8 2. Exhibits 4-6 to the von Herzen Dec.

9 In short, the above documents discuss, refer to, or comprise information Apple may
10 consider confidential in the context of Samsung's Motion to Strike Expert Testimony Based on
11 Undisclosed Facts and Theories. Samsung expects that Apple may file the declaration required
12 by Local Rule 79-5(d) to permit the sealing of the unredacted von Herzen Dec. and Exhibits 4-6.

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

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17 DATED: June 7, 2012

QUINN EMANUEL URQUHART &
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20 By /s/ Victoria Maroulis

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INC., and SAMSUNG

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