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13 Attorneys for SAMSUNG ELECTRONICS
 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.
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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 Exhibits 1, 2, 19 – 22, 24 and 28 to the
6 Declaration of Bill Trac in Support of Samsung's Reply In Support of Samsung's
7 Motion for Summary Judgment;

8 In short, the above documents discuss, refer to, or comprise interrogatory objections and
9 responses that the parties have designated as HIGHLY CONFIDENTIAL — ATTORNEYS'
10 EYES ONLY. Exhibits 1, 2, 19-22, 24 and 28 to the Trac Declaration contain Apple's
11 confidential business information, and Samsung expects that Apple will file the declaration
12 required by Local Rule 79-5(d) to establish this document as sealable.

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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