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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:

- 5 1. The confidential, unredacted version of the Declaration of Trevor Darrell in
6 Support of Samsung’s Motion to Strike Expert Testimony Based on Undisclosed
7 Facts and Theories (“Darrell Declaration”); and
- 8 2. Exhibits D and E to the Darrell Declaration.

9 The above documents discuss, refer to, or comprise information Apple may consider
10 confidential in the context of Samsung’s Motion to Strike Expert Testimony Based on
11 Undisclosed Facts and Theories. Samsung expects that Apple will file the declaration required
12 by Local Rule 79-5(d) to permit the sealing of the unredacted Darrell Declaration and Exhibits D
13 and E. In addition, paragraphs 22-33 of the Darrell Declaration contain information Samsung
14 considers confidential. Samsung has established good cause to seal paragraphs 22-33 through
15 the Declaration of Todd Briggs in Support of Samsung’s Administrative Motion to File
16 Documents Under Seal.

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

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20 DATED: June 8, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

21 By /s/ Victoria Maroulis

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26 LTD., SAMSUNG ELECTRONICS AMERICA,
27 INC., and SAMSUNG
28 TELECOMMUNICATIONS AMERICA, LLC