

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Charles K. Verhoeven (Cal. Bar No. 170151)  
2 charlesverhoeven@quinnemanuel.com  
50 California Street, 22nd Floor  
3 San Francisco, California 94111  
Telephone: (415) 875-6600  
4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
kevinjohnson@quinnemanuel.com  
6 Victoria F. Maroulis (Cal. Bar No. 202603)  
victoriamaroulis@quinnemanuel.com  
7 555 Twin Dolphin Drive 5th Floor  
Redwood Shores, California 94065  
8 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)  
10 michaelzeller@quinnemanuel.com  
865 S. Figueroa St., 10th Floor  
11 Los Angeles, California 90017  
Telephone: (213) 443-3000  
12 Facsimile: (213) 443-3100

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 (PSG)

**SAMSUNG'S MOTION TO REMOVE  
INCORRECTLY FILED DOCUMENT  
NUMBER 977-3**

Hon. Lucy H. Koh

1 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung  
2 Telecommunications America, LLC (collectively “Samsung”) hereby move to remove Docket No.  
3 977-3 (Public Redacted Version of Samsung’s Opposition to Apple’s Motion for Entry of  
4 Preliminary Injunction Without Further Hearing (“Opposition”)) from ECF that was inadvertently  
5 submitted publicly on May 25, 2012. Footnote 4 of this redacted document contains information  
6 designated by Apple as Highly Confidential-Attorneys’ Eyes Only under the protective order  
7 governing this case (Dkt. 687), specifically the relative market share information derived from  
8 Exhibits 1 and 2 to the Declaration of Carl Anderson.

9 On June 4, 2012, this Court ruled that the detailed market share information in Exhibits 1  
10 and 2 to the Declaration of Carl Anderson, and the portions of the Opposition derived from those  
11 exhibits, are properly sealable. See Dkt. 1034 at 1-2.

12 On June 11, 2012, Samsung filed an updated, redacted version of its Opposition consistent  
13 with this Court’s June 4, 2012 Order, including, *inter alia*, redacting the market share information  
14 in footnote 4 derived from Exhibits 1 and 2 to the Declaration of Carl Anderson. See Dkt. 1079.

15 For the foregoing reasons, Samsung respectfully requests that the Court grant this Motion  
16 to Remove Incorrectly Filed Document 977-3.

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DATED: June 11, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria Maroulis  
Charles K. Verhoeven  
Kevin P.B. Johnson  
Victoria F. Maroulis  
Michael T. Zeller  
Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC