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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 (PSG)

**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 Motion for Leave to Seek
6 Reconsideration of the Court’s June 25, 2012 Order to the Extent it Precludes
7 Consideration of a Preliminary Injunction on the ‘889 Patent Based on Current
8 Evidence (“the Motion”); and
- 9 2. Unredacted Exhibits 1, 2, 3, 10, 12, 13, 14, and 20 to the Watson Declaration.

10 In short, the above documents discuss, refer to, or comprise excerpts of documents that has
11 been designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY under the
12 Protective Order. This Administrative Motion is supported by the Court’s June 4, 2012 Order
13 Granting in Part, Denying in Part Motions to Seal that upheld the sealing of the above referenced
14 documents except for Exhibit 20 to the Watson Declaration, which was not submitted to the Court
15 when Samsung initially sought leave for reconsideration of the Court’s May 21, 2012 Order.
16 (See Dkt. 1034 at 1-3 (citing the Anderson Declaration [sic], which is actually the Watson
17 Declaration that is being refilled in support of this Motion; *see also* Dkt. 978-2.)

18 With respect to Exhibit 20 to the Watson Declaration, Apple has designated the Peter
19 Bressler deposition transcript as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.
20 Samsung expects that Apple will file a declaration pursuant to Civil L.R. 79-5(d) establishing
21 good cause to seal this exhibit.

22 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
23 for *in camera* review and served on all parties. Redacted versions of Samsung’s Motion and
24 Exhibits 3 and 10 to the Watson Declaration have been filed concurrently with this motion.

1 DATED: June 26, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria Maroulis

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INC., and SAMSUNG
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