

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

25 Defendants.

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 the following:

- 5 1. Samsung’s Opposition to Apple’s Claim Construction Brief; and
- 6 2. Exhibit 5 to the Declaration of Adam Cashman in Support of Samsung’s
7 Opposition to Apple’s Claim Construction Brief.

8 In short, the above documents contain discussion or excerpts from documents and
9 materials that have been designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES
10 ONLY. Samsung has established good cause to permit filing these documents under seal through
11 the Declaration of Bill Trac in Support of Samsung’s Administrative Motion to File Documents
12 Under Seal, filed herewith. Samsung expects that Apple will also file a declaration under Local
13 Rule 79-5(d) establishing good cause for filing these confidential materials under seal.

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

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17 DATED: June 26, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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20 By /s/ Victoria Maroulis

Charles K. Verhoeven
Kevin P.B. Johnson
Victoria F. Maroulis
Michael T. Zeller

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23 Attorneys for SAMSUNG ELECTRONICS CO.,
24 LTD., SAMSUNG ELECTRONICS AMERICA,
25 INC., and SAMSUNG
26 TELECOMMUNICATIONS AMERICA, LLC
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