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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

**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. Samsung’s Reply in Support of Opening Memorandum Regarding Claim
6 Construction; and
- 7 2. Exhibits 1-3 to the Declaration of Katharine Barach in Support of Samsung’s Reply
8 in Support of Opening Memorandum Regarding Claim Construction.

9 In short, the above documents discuss, refer to, or comprise documents which Apple has
10 designated as HIGHLY CONFIDENTIAL — ATTORNEYS’ EYES ONLY. Samsung expects
11 that Apple will file the declaration required by Local Rule 79-5(d) to establish these documents as
12 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: July 3, 2012

QUINN EMANUEL URQUHART &
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20 By /s/ Victoria Maroulis

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INC., and SAMSUNG

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