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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 the following:

- 5 1. Samsung’s Claim Construction Brief; and
- 6 2. Exhibits 2, 4, 6, and 9-14 to the Declaration of Patrick Schmidt in Support of
7 Samsung’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.

16
17 DATED: July 5, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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19
20 By /s/ Victoria Maroulis

21 Charles K. Verhoeven
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26 LTD., SAMSUNG ELECTRONICS AMERICA,
27 INC., and SAMSUNG
28 TELECOMMUNICATIONS AMERICA, LLC