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 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**

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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. The unredacted version of Samsung's Motions *in Limine*; and
- 6 2. Exhibits C, E, G-N, S, T, V, W, and Y to the Declaration of John D’Amato in
7 Support of Samsung’s Motions *in Limine*.

8 In short, the above documents discuss, refer to, or comprise information the parties have
9 designated as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY. Exhibits S and T to
10 the D’Amato Declaration discuss, refer to, or comprise documents Apple Inc. (“Apple”) has
11 designated as confidential. Exhibits C, E, G-N, V, W, and Y to the D’Amato Declaration
12 discuss, refer to, or comprise documents Samsung has designated as confidential. Samsung’s
13 Motions *in Limine* and Exhibit S to the D’Amato Declaration contain information both Apple and
14 Samsung have designated as confidential. Samsung has established good cause to seal
15 Samsung’s Motions *in Limine* and Exhibits C, E, G-N, S, V, W, and Y to the D’Amato
16 Declaration through the Declaration of Hankil Kang in Support of Samsung’s Administrative
17 Motion to File Documents Under Seal. Samsung expects that Apple will file the declaration
18 required by Local Rule 79-5(d) to permit the Samsung’s Motions *in Limine* and Exhibits S and T
19 to the D’Amato Declaration.

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

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DATED: July 5, 2012

QUINN EMANUEL URQUHART &
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By /s/ Victoria Maroulis
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