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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 Opposition to Apple’s Claim Construction Brief.

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

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

14  
15 DATED: July 10, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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17  
18 By /s/ Victoria Maroulis

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25 INC., and SAMSUNG  
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