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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.
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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 Oppositions to Apple’s Motions *in Limine*
6 (“Samsung’s Oppositions”); and
- 7 2. Exhibits A-C, and E-J to the Declaration of John D’Amato in Support of
8 Samsung’s Oppositions (“D’Amato Declaration”).

9 In short, the above documents discuss, refer to, or comprise information the parties have
10 designated as HIGHLY CONFIDENTIAL — ATTORNEYS’ EYES ONLY. Exhibits A-C, and
11 G to the D’Amato Declaration discuss, refer to, or comprise documents Apple Inc. (“Apple”) has
12 designated as confidential. Exhibits E, F, and H-J to the D’Amato Declaration discuss, refer to,
13 or comprise documents Samsung has designated as confidential. Samsung’s Oppositions contain
14 information both Apple and Samsung have designated as confidential. Samsung has established
15 good cause to seal portions of Samsung’s Oppositions and Exhibits E, F, and H-J 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 sealing of portions of Samsung’s Oppositions and
19 Exhibits A-C, and G 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 10, 2012

QUINN EMANUEL URQUHART &
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