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CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
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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. The confidential, unredacted version of Samsung's Trial Brief; and
- 6 2. Exhibits 1-4 and 10-18 of the Declaration of Joby Martin in Support of Samsung's
7 Trial Brief.

8 In short, the above document discusses and refers to documents which Apple has
9 designated as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY under the Protective
10 Order. Samsung expects that Apple will file the declaration required by Local Rule 79-5(d) to
11 establish these documents as sealable.

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.

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16 DATED: July 23, 2012

QUINN EMANUEL URQUHART &
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19 By /s/ Victoria Maroulis

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