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16 Attorneys for Samsung Electronics America, Inc.  
 17 and Samsung Telecommunications America LLC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

20 APPLE INC., a California corporation,  
 21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a  
 24 Korean business entity; SAMSUNG  
 ELECTRONICS AMERICA, INC., a New  
 25 York corporation; SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 26 LLC, a Delaware limited liability company,

27 Defendants.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE  
 MOTION TO FILE DOCUMENTS  
 UNDER SEAL**

**Date: August 24, 2011**  
**Time: 2:00 pm**  
**Place: Courtroom 4, 5th Floor**  
**Judge: Hon. Lucy H. Koh**

1 Pursuant to Civil L.R. 79-5 and 7-11, and General Order No. 62, Samsung Electronics  
2 America, Inc. (“SEA”) and Samsung Telecommunications America, LLC (“STA”) (collectively  
3 “Samsung”) hereby bring this administrative motion for a sealing order to seal portions of the  
4 Declaration of Eunha Kim In Support of Samsung’s Reply In Support of its Motion to Disqualify  
5 Bridges & Mavrakakis LLP. (the “Kim Reply Declaration”), Exhibit F attached to the Declaration  
6 of Austin Tarango In Support of Samsung's Reply In Support of its Motion to Disqualify Bridges  
7 & Mavrakakis, LLP (“Tarango Reply Declaration”) and the corresponding discussion of this  
8 confidential information in Samsung's Reply In Support of Its Motion to Disqualify Bridges &  
9 Mavrakakis LLP. (“Reply”).

10 The Kim Reply Declaration, contains confidential, non-public information regarding a  
11 settlement meeting that occurred between Apple and Samsung in or about September 2010.  
12 Pursuant to General Order No. 62, a copy of the Declaration has been lodged with the Court for *in*  
13 *camera* review, served on all parties, and will be e-filed with the Court pending the Court’s  
14 granting of this Motion to Seal. The following portions of the Declaration of Eunha Kim have  
15 been properly filed under seal because they contain confidential information: ¶¶ 5-6.

16 Exhibit F of the Tarango Reply Declaration contains excerpts from the deposition of Mr.  
17 Richard Lutton. Apple has designated this deposition HIGHLY CONFIDENTIAL-  
18 ATTORNEYS' EYES ONLY under the interim protective order. These deposition excerpts also  
19 relate to the settlement meetings between Samsung and Apple and include detailed descriptions of  
20 the confidential discussions that took place at these meetings between the parties. Pursuant to  
21 General Order No. 62, a copy of Exhibit F has been lodged with the Court for *in camera* review,  
22 served on all parties, and will be e-filed with the Court's granting of this Motion  
23 to Seal.

24 Samsung’s Reply contains confidential, non-public information regarding a settlement  
25 meeting that occurred between Apple and Samsung. This includes discussion of the September  
26 2010 meeting between Samsung and Apple, as well as the other meetings discussed by Mr.  
27 Richard Lutton in his deposition. Pursuant to General Order No. 62, a copy of the Reply has been  
28 lodged with the Court for *in camera* review, served on all parties, and will be e-filed with the

1 Court pending the Court's granting of this Motion to Seal. The following portions of the Reply  
2 have been properly filed under seal because they contain confidential information: Lines 18-20  
3 and 22-24 on page 12, and lines 7-10 and 11-14 on page 14.

4 This request is narrowly tailored to seal only the material for which good cause to seal has  
5 been established. Accordingly, Samsung respectfully requests that the Court order that Paragraphs  
6 5-6 of the Kim Reply Declaration, Exhibit F attached to the Tarango Reply Declaration, and the  
7 portions of Samsung's Reply discussing this confidential information be filed under seal.

8 DATED: August 8, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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