

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Charles K. Verhoeven (Cal. Bar No. 170151)  
 2 charlesverhoeven@quinnemanuel.com  
 50 California Street, 22<sup>nd</sup> Floor  
 3 San Francisco, California 94111  
 Telephone: (415) 875-6600  
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
 kevinjohnson@quinnemanuel.com  
 6 Victoria F. Maroulis (Cal. Bar No. 202603)  
 victoriamaroulis@quinnemanuel.com  
 7 555 Twin Dolphin Drive 5<sup>th</sup> Floor  
 Redwood Shores, California 94065  
 8 Telephone: (650) 801-5000  
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)  
 michaelzeller@quinnemanuel.com  
 10 865 S. Figueroa St., 10th Floor  
 Los Angeles, California 90017  
 11 Telephone: (213) 443-3000  
 12 Facsimile: (213) 443-3100

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.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S RESPONSE TO THIRD  
 PARTIES' OBJECTIONS TO THE  
 PARTIES' STIPULATION AND  
 [PROPOSED] ORDER REGARDING A  
 PROCEDURE FOR REDUCING THE  
 NUMBER OF SEALING REQUESTS**

1 **Samsung's Response to Third Parties' Objections**

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3 Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung  
4 Telecommunications America, LLC (collectively, "Samsung") file this Response to nonparties  
5 Research In Motion Corporation's, Research In Motion Ltd.'s ("RIM's"), and Motorola's  
6 objections to the Stipulation and [Proposed] Order Regarding a Procedure for Reducing the  
7 Number of Sealing Requests. (Dkt. Nos. 1613 and 1625.) The Stipulation provides the Court  
8 and the parties a framework to avoid requesting that the Court seal trial exhibits. The third  
9 parties' limited objections to one paragraph should not preclude the Court from adopting the  
10 remainder of the Stipulation.

11 The third parties object only to the procedure outlined in paragraph 5 of the Stipulation.  
12 (Dkt. No. 1613 at 1; Dkt. No. 1625 at 1.) Specifically, the third parties argue that any public  
13 disclosure of the terms of the licensing agreements will cause competitive harm. (Dkt. No. 1613  
14 at 1-2; Dkt. No. 1625 at 1-2.) Other third parties have raised similar concerns regarding the  
15 public disclosure of the terms of licensing agreements. Samsung does not oppose any efforts by  
16 RIM, Motorola or other third parties to impose greater restrictions on the disclosure of licensing  
17 information or their efforts to seal the information entirely. The procedure outlined in paragraph  
18 5, including substituting the names of third parties with neutral identifiers, represents an effort by  
19 the parties to address concerns about confidentiality and will only be necessary if the Court denies  
20 pending motions to seal the terms of licensing agreements with third parties.

21 Since the third parties' objections are limited to the procedure in paragraph 5, Samsung  
22 respectfully requests that the Court adopt the Stipulation.

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1 DATED: August 8, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

2  
3 By /s/ Victoria Maroulis

4 Charles K. Verhoeven

5 Kevin P.B. Johnson

6 Victoria F. Maroulis

7 Michael T. Zeller

8 Attorneys for SAMSUNG ELECTRONICS CO.,

9 LTD., SAMSUNG ELECTRONICS AMERICA,

10 INC., and SAMSUNG

11 TELECOMMUNICATIONS AMERICA, LLC

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