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13 Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

14 INC. and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a

Korean business entity; SAMSUNG

23 ELECTRONICS AMERICA, INC., a New

York corporation; SAMSUNG

24 TELECOMMUNICATIONS AMERICA,

LLC, a Delaware limited liability company,

25 Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S STIPULATED
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

Date: October 13, 2011

Time: 1:30 pm

Place: Courtroom 8, 4th Floor

Judge: Hon. Lucy H. Koh

1 Pursuant to Civil L.R. 79-5 and 7-11, and General Order No. 62, Defendants Samsung
2 Electronics Co. Ltd. (“SEC”), Samsung Electronics America, Inc. (“SEA”) and Samsung
3 Telecommunications America, LLC (“STA”) (collectively, “Samsung”) hereby bring this
4 administrative motion for a sealing order to seal:

- 5 1) Exhibits 1, 3, 5 and 8 to the Declaration of Michael T. Zeller in Support of Samsung’s
6 Motion to Exclude Ordinary Observer Opinions of Apple Expert Cooper Woodring
7 (“Zeller Declaration”); and
- 8 2) The confidential, unredacted version of Samsung’s Motion to Exclude Ordinary
9 Observer Opinions of Apple Expert Cooper Woodring which includes the information
10 contained in Exhibits 1, 3, 5 and 8 to the Zeller Declaration.

11 Plaintiff Apple Inc. (“Apple”) has designated the documents or deposition excerpts and deposition
12 exhibits in Exhibits 1, 3, 5 and 8 to the Zeller Declaration as “CONFIDENTIAL” or “HIGHLY
13 CONFIDENTIAL ATTORNEYS’ EYES ONLY” pursuant to the interim protective order for the
14 Northern District of California. Portions of Samsung’s Motion to Exclude Ordinary Observer
15 Opinions of Apple Expert Cooper Woodring include discussion of the documents or transcript
16 excerpts and exhibits from the depositions that Apple has designated “CONFIDENTIAL” or
17 “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY.” Samsung accordingly files these
18 documents under seal, and expects that Apple will comply with Local Rule 79-5(d) by filing an
19 appropriate declaration with the Court within seven days for those sections and documents that
20 reference Apple-designated information. Pursuant to General Order No. 62, copies of Exhibits 1,
21 3, 5 and 8 to the Zeller Declaration and the confidential, unredacted version of Samsung’s Motion
22 to Exclude Ordinary Observer Opinions of Apple Expert Cooper Woodring have been lodged with
23 the Court for in camera review, served on all parties, and will be e-filed with the Court pending the
24 Court’s granting of this Motion to Seal.

25 This request is narrowly tailored to seal only the material for which good cause to seal has
26 been established. Accordingly, Samsung respectfully requests that the Court order that the
27 confidential, unredacted version of Samsung’s Motion to Exclude Ordinary Observer Opinions of
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