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13 Attorneys for SAMSUNG ELECTRONICS CO.,
 LTD., SAMSUNG ELECTRONICS AMERICA,
 14 INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION
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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.
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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

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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 M, N, O, LL, P, FF, HH, MM, NN, OO and QQ to the Declaration of Sara
6 Jenkins in Support of Samsung’s Opposition to Apple’s Motion for a Preliminary
7 Injunction (“Jenkins Declaration”);
- 8 2) The Declaration of Michael Wagner in Support of Samsung’s Opposition to Apple’s
9 Motion for a Preliminary Injunction and Exhibits B, D, and E;
- 10 3) Paragraph 58 and Exhibit 3 of the Declaration of Jeffrey Johnson in Support of
11 Samsung’s Opposition to Apple’s Motion for a Preliminary Injunction;
- 12 4) The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion for a
13 Preliminary Injunction which includes information contained in the documents or
14 sections referenced in paragraphs (1)-(3) above.

15 Plaintiff Apple Inc. (“Apple”) has designated the deposition excerpts and deposition
16 exhibits in Exhibits M, N, O, LL, P, FF, HH, MM, NN, OO, and QQ to the Jenkins Declaration as
17 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY” pursuant to
18 the interim protective order for the Northern District of California. Apple also has e-filed the
19 Declaration of Richard J. Lutton under seal. Dkt. No. 128.

20 Portions of Samsung’s Opposition to Apple’s Motion for a Preliminary Injunction include
21 discussion of the transcript excerpts and exhibits from the depositions that Apple has designated
22 “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY” or from the
23 Declaration of Richard Lutton. Samsung accordingly files these documents under seal, and
24 expects that Apple will comply with Local Rule 79-5(d) by filing an appropriate declaration with
25 the Court within seven days for those sections and documents that reference Apple-designated
26 information. Pursuant to General Order No. 62, copies of Exhibits M, N, O, LL, P, FF, HH, MM,
27 NN, OO, and QQ to the Jenkins Declaration have been lodged with the Court for in camera
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1 review, served on all parties, and will be e-filed with the Court pending the Court’s granting of
2 this Motion to Seal.

3 Moreover, the Declaration of Michael Wagner discusses information that Apple has
4 designated “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL ATTORNEYS’ EYES ONLY.”
5 In addition, paragraph 58 and Exhibit 3 of the Declaration of Jeffrey Johnson include highly
6 confidential information relating to Samsung’s trade secrets and/or source code. Portions of
7 Samsung’s Opposition to Apple’s Motion for a Preliminary Injunction discuss the information
8 from these declarations. Pursuant to General Order No. 62, copies of these Declarations and the
9 confidential, unredacted version of Samsung’s Opposition to Apple’s Motion for a Preliminary
10 Injunction have been lodged with the Court for in camera review, served on all parties, and will be
11 e-filed with the Court pending the Court’s granting of this Motion to Seal.

12 This request is narrowly tailored to seal only the material for which good cause to seal has
13 been established. Accordingly, Samsung respectfully requests that the Court order that the
14 confidential, unredacted version of Samsung’s Opposition to Apple’s Motion for a Preliminary
15 Injunction; Exhibits M, N, O, LL, P, FF, HH, MM, NN, OO, and QQ to the Declaration of Sara
16 Jenkins in Support of Samsung’s Opposition to Apple’s Motion for a Preliminary Injunction; the
17 Declaration of Michael Wagner; and Paragraph 58 and Exhibit 3 of the Declaration of Jeffrey
18 Johnson be filed under seal.

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1 DATED: August 22, 2011

Respectfully submitted,

2 QUINN EMANUEL URQUHART &
3 SULLIVAN, LLP

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5 By /s/ Victoria Maroulis

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11 LTD., SAMSUNG ELECTRONICS AMERICA,
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