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 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 STIPULATED  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL PURSUANT TO CIVIL  
 LOCAL RULES 7-11 AND 79-5 AND  
 GENERAL ORDER NO. 62**

1 Pursuant to Civil L.R. 7-11 and 79-5, 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 an order to seal:

- 5 1. Samsung’s Motion to Compel Apple to Produce Documents And Things In  
6 Response to Samsung’s Request for Production No. 1 and Further Responses to  
7 Interrogatories Nos. 1, 3, and 6 (the “Motion to Compel”).
- 8 2. The confidential, unredacted version of the Declaration of Sara Jenkins in Support  
9 of Samsung’s Motion to Compel (the “Supporting Declaration”).
- 10 3. Exhibits D-L, and N-P to the Supporting Declaration.

11 Samsung has established good cause to permit filing these documents under seal through  
12 the Jenkins Declaration in support of this motion to file under seal, filed herewith. In particular,  
13 the Motion to Compel discusses in detail information that Apple has designated as HIGHLY  
14 CONFIDENTIAL – ATTORNEY’S EYES ONLY. (Jenkins Decl. ¶ 2.)

15 The Supporting Declaration to the Motion to Compel likewise discusses these confidential  
16 sources of information, and a majority of the exhibits to the Supporting Declaration have been  
17 designated by Apple as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY under the  
18 interim protective order, or contain discussion and references to information that Apple has  
19 designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY. (Jenkins Decl. ¶¶ 3-  
20 14.) Samsung expects that, pursuant to Local Rule 79-5(d), Apple will file within seven days an  
21 appropriate declaration with the Court establishing that the documents and information it has  
22 designated as highly confidential are sealable.

23 Pursuant to General Order No. 62, the complete, unredacted versions of Samsung’s Motion  
24 to Compel, Supporting Declaration, and all Exhibits to the Supporting Declaration will be lodged  
25 with the Court for in camera review and served on all parties.

26 Apple does not oppose this motion. (Jenkins Decl. ¶ 15.)  
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DATED: August 31, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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