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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 ITS REPLY BRIEF IN  
 SUPPORT OF ITS MOTION TO  
 COMPEL**

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. The confidential, unredacted version of Samsung’s Reply in Support of its Motion  
6 to Compel Apple to Produce Documents And Things In Response to Samsung’s  
7 Request for Production No. 1 and Further Responses to Interrogatories Nos. 1, 3,  
8 and 6 (the “Reply”).

9 Samsung has established good cause to permit filing this document under seal through the  
10 Arnold Declaration in support of this motion to file under seal, filed herewith. In particular, the  
11 Reply contains information relating to Apple’s design trade practices and policies. (Arnold Decl.  
12 ¶ 2.) Apple has represented to Samsung that such information is highly confidential to Apple.  
13 (*Id.*) The Reply also contains references to attorney communications and interrogatory responses  
14 that Apple has designated as highly confidential. (Arnold Decl. ¶ 3-4.)

15 Samsung expects that, pursuant to Local Rule 79-5(d), Apple will file within seven days an  
16 appropriate declaration with the Court establishing that the documents and information it has  
17 designated as highly confidential are sealable.

18 Pursuant to General Order No. 62, the complete, unredacted versions of Samsung’s Reply  
19 will be lodged with the Court for in camera review and served on all parties.

20 Apple does not oppose this motion. (Arnold Decl. ¶ 5.)

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DATED: September 12, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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