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 Attorneys for SAMSUNG ELECTRONICS
 15 CO., LTD., SAMSUNG ELECTRONICS
 AMERICA, INC. and SAMSUNG
 16 TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

22 SAMSUNG ELECTRONICS CO., LTD., a
 23 Korean business entity; SAMSUNG
 ELECTRONICS AMERICA, INC., a New
 24 York corporation; SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 25 LLC, a Delaware limited liability company,

26 Defendants.

CASE NO. 11-cv-01846-LHK (PSG)

**SAMSUNG'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

1 Pursuant to Civil L.R. 7-11 and 79-5, and General Order No. 62, Samsung Electronics Co.
2 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC
3 (collectively, “Samsung”) hereby bring this administrative motion for an order to seal portions of
4 Samsung’s Motion to Compel Depositions of Apple Reply Expert Declarants (“Samsung’s Motion
5 to Compel”).

6 Samsung’s Motion to Compel contains descriptions of the operation of confidential
7 Samsung source code. (Declaration of Hankil Kang ¶ 2.) Disclosure of this information poses
8 a competitive harm to Samsung as competitors can re-create the features found in Samsung’s
9 products using the information contained in the document. (*Id.*) “Compelling reasons” to seal
10 exist where the documents to be sealed are “sources of business information that *might harm a*
11 *litigant’s competitive standing.*” *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598
12 (1978) (emphasis added). Portions of Samsung’s Motion to Compel should thus be sealed.

13 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
14 for *in camera* review and served on all parties. A proposed redacted version of Samsung’s
15 Motion to Compel is filed concurrently with this motion.

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17 DATED: November 16, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria Maroulis
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