

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Charles K. Verhoeven (Cal. Bar No. 170151)  
 2 charlesverhoeven@quinnemanuel.com  
 50 California Street, 22nd Floor  
 3 San Francisco, California 94111  
 Telephone: (415) 875-6600  
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
 kevinjohnson@quinnemanuel.com  
 6 Victoria F. Maroulis (Cal. Bar No. 202603)  
 victoriamaroulis@quinnemanuel.com  
 7 555 Twin Dolphin Drive 5th Floor  
 Redwood Shores, California 94065  
 8 Telephone: (650) 801-5000  
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)  
 10 michaelzeller@quinnemanuel.com  
 865 S. Figueroa St., 10th Floor  
 11 Los Angeles, California 90017  
 Telephone: (213) 443-3000  
 12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS  
 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.  
 25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S STIPULATED  
 ADMINISTRATIVE MOTION TO FILE  
 UNDER SEAL ITS REPLY IN SUPPORT  
 OF ITS MOTION TO EXCLUDE  
 ORDINARY OBSERVER OPINIONS OF  
 APPLE EXPERT COOPER WOODRING**

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

- 5 1. The confidential, unredacted version of Samsung’s Reply in Support of its Motion  
6 to Exclude Ordinary Observer Opinions of Apple Expert Cooper Woodring (the  
7 “Reply”); and
- 8 2. Exhibit 3 to the Supplemental Declaration of Michael Zeller in Support of the  
9 Reply (“Exhibit 3”).

10 Samsung has established good cause to permit filing these documents under seal through  
11 the Buchakjian Declaration in support of this motion to file under seal, filed herewith. In  
12 particular, the Reply contains information and quotations from documents produced by Apple and  
13 the deposition transcripts of Cooper Woodring and Christopher Stringer that have been designated  
14 by Apple, Inc. (“Apple”) as “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY ”  
15 pursuant to the interim protective order for the Northern District of California. (Buchakjian Decl.  
16 ¶ 2.) Exhibit 3 is a compilation of excerpts from the deposition of Christopher Stringer, all of  
17 which Apple designated as “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY ”  
18 pursuant to the interim protective order. (Buchakjian Decl. ¶ 3.)

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

22 Pursuant to General Order No. 62, the complete, unredacted version of Samsung’s Reply  
23 and Exhibit 3 to the Supplemental Zeller declaration along with all supporting documents will be  
24 lodged with the Court for in camera review and served on all parties.

25 Apple does not oppose this motion. (Buchakjian Decl. ¶ 4.)  
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DATED: September 20, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria F. Maroulis  
Charles K. Verhoeven  
Kevin P.B. Johnson  
Victoria F. Maroulis  
Michael T. Zeller  
Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC