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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.
 25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 DOCUMENTS IN SUPPORT OF ITS
 OPPOSITION TO APPLE'S 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., 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 the Declaration of Melissa Chan in Support
6 of Samsung’s Opposition to Apple’s Motion to Compel (the “Chan Declaration”);
- 7 2. Exhibits 10, 15-17 to the Chan Declaration;
- 8 3. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
9 of Samsung’s Opposition to Apple’s Motion to Compel (the “Jenkins
10 Declaration”);
- 11 4. The confidential, unredacted version of the Declaration of Russel Wilkins in
12 Support of Samsung’s Opposition to Apple’s Motion to Compel (the “Wilkins
13 Declaration”).

14 Samsung has established good cause to permit filing these documents under seal through
15 the Arnold Declaration in support of this motion, filed herewith.

16 Pursuant to General Order No. 62, Samsung’s entire filing, including the complete,
17 unredacted version of the Chan Declaration, Exhibits 10, 15-17 to the Chan Declaration, the
18 Jenkins Declaration, and the Wilkins Declaration, will be lodged with the Court for in camera
19 review and served on all parties.

20 Apple does not oppose this motion.

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1 DATED: September 26, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria F. Maroulis
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