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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 UNOPPOSED MOTION TO
 FILE DOCUMENTS UNDER SEAL**

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. Samsung’s Opposition to Apple’s Motion for a Protective Order;
- 6 2. Declaration of Brett Arnold in Support of Samsung’s Opposition to Apple’s Motion
7 for a Protective Order (“Arnold Declaration”) and its exhibits;
- 8 3. Samsung’s [Proposed] Order Denying Apple’s Motion for a Protective Order;

9 Samsung has established good cause to permit filing these documents under seal through
10 the Declaration of Brett Arnold in Support of Samsung’s Administrative Motion to File
11 Documents Under Seal (the “Sealing Declaration”), filed herewith. The above documents
12 contain discussions or excerpts of deposition transcripts that Apple has designated as
13 CONFIDENTIAL — ATTORNEYS EYES ONLY under the interim protective order. Samsung
14 trusts that Apple will file the necessary declaration validating this designation. The above
15 documents also discuss or contain references to matters that both parties agree are unrelated to the
16 parties’ substantive disputes in this case.

17 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
18 for in camera review and served on all parties.

19 Apple does not oppose this motion.

20 DATED: October 28, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

23 By /s/ Victoria F. Maroulis

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LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC