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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 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 Motion to Compel Apple to Produce Documents and Things (the
6 “Motion to Compel”);
- 7 2. The Declaration of Anna Neill in Support of Samsung’s Motion to Compel and
8 Motion to Shorten Time (the “Neill Declaration”) and its exhibits;
- 9 3. Samsung’s [Proposed] Order Granting Samsung’s Motion to Compel;
- 10 4. Samsung’s Motion to Shorten Time for Briefing and Hearing on Samsung’s Motion
11 to Compel; and
- 12 5. Samsung’s [Proposed] Order Granting Samsung’s Motion to Shorten Time for
13 Briefing and Hearing on Samsung’s Motion to Compel.

14 Samsung has established good cause to permit filing these documents under seal through
15 the Declaration of Brett Arnold in Support of Samsung’s Administrative Motion to File
16 Documents Under Seal, filed herewith. The above documents discuss and refer to documents
17 and things that Apple has designated as CONFIDENTIAL — ATTORNEYS EYES ONLY under
18 the interim protective order. Samsung trusts that Apple will file the necessary declaration
19 validating these designations per Local Rule 79-5(d).

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

22 Apple does not oppose this motion.

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1 DATED: October 28, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria F. Maroulis
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