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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.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S 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. The unredacted, confidential version of Samsung’s Response to Apple’s  
6 Supplemental Statement Concerning Samsung’s Motion to Compel (“Samsung’s  
7 Response”); and
- 8 2. Exhibits A and B to the Declaration of Brett Arnold in Support of Samsung’s  
9 Response.

10 Samsung has established good cause to permit filing these documents under seal through  
11 the Declaration of Brett Arnold in Support of Samsung’s Administrative Motion to File  
12 Documents Under Seal, filed herewith. In short, the above documents discuss and refer to  
13 documents and things that the parties have designated as confidential under the interim protective  
14 order.

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

17  
18 DATED: November 7, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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21 By /s/ Kevin P.B. Johnson

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23 LTD., SAMSUNG ELECTRONICS AMERICA,  
24 INC., and SAMSUNG  
25 TELECOMMUNICATIONS AMERICA, LLC  
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