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 CO., LTD., SAMSUNG ELECTRONICS
 14 AMERICA, INC. and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC
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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 ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

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1 Pursuant to Civil L.R. 7-11 and 79-5, and General Order No. 62 and the Court's Order
2 dated December 2, 2011, Defendants Samsung Electronics Co. Ltd., Samsung Electronics
3 America, Inc., and Samsung Telecommunications America, LLC (collectively, "Samsung")
4 hereby bring this administrative motion for an order to seal:

- 5 1. The Declaration of Mark Tung in Support of Samsung's Notice of Lodging of
6 Materials in Opposition to Apple's Motion for a Preliminary Injunctions ("Tung
7 Declaration"); and
- 8 2. Exhibits E, G, N, T, V, and X of the Tung Declaration.

9 These documents were lodged with the Court on October 17, 2011 in connection with
10 Docket Numbers 306 and 307. Samsung has established good cause to permit filing these
11 documents under seal through the Declaration of Melissa N. Chan in Support of Samsung's
12 Administrative Motion to File Documents Under Seal, filed herewith. In short, the above
13 documents discuss and refer to documents and things that the parties have designated as
14 confidential under the interim protective 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.

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18 DATED: December 7, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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21 By /s/ Victoria F. Maroulis

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