

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Charles K. Verhoeven (Cal. Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com  
50 California Street, 22nd Floor  
3 San Francisco, California 94111  
Telephone: (415) 875-6600  
4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
kevinjohnson@quinnemanuel.com

6 Victoria F. Maroulis (Cal. Bar No. 202603)  
victoriamaroulis@quinnemanuel.com  
7 555 Twin Dolphin Drive 5th Floor  
Redwood Shores, California 94065  
8 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)

10 michaelzeller@quinnemanuel.com  
865 S. Figueroa St., 10th Floor  
11 Los Angeles, California 90017  
Telephone: (213) 443-3000  
12 Facsimile: (213) 443-3100

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.  
25  
26  
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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 confidential, unredacted version of Samsung’s Motion to Compel Production  
6 of Documents and Things and Responsive Answers to Propounded Discovery;
- 7 2. The confidential, unredacted version of the Declaration of Diane C. Hutnyan in  
8 Support of Samsung’s Motion to Compel Production of Documents and Things and  
9 Responsive Answers to Propounded Discovery;
- 10 3. Exhibits 1-13, 15-19, and 21 to the Declaration of Diane C. Hutnyan in Support of  
11 Samsung's Motion to Compel Production of Documents and Things and  
12 Responsive Answers to Propounded Discovery.

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

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. Proposed public redacted versions of the  
19 documents listed above are attached hereto as exhibits.

1 DATED: December 12, 2011

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

4 By /s/ Victoria Maroulis

Charles K. Verhoeven

Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC