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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 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, 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 Opposition to Apple’s Motion
6 to Compel Production of Documents and Things;
- 7 2. Exhibits 1, 9, 10, and 11 to the Declaration of Melissa Chan in Support of
8 Samsung’s Opposition to Apple’s Motion to Compel Production of Documents and
9 Things (the “Chan Declaration”);
- 10 3. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
11 of Samsung’s Opposition to Apple’s Motion to Compel Production of Documents
12 and Things (the “Jenkins Declaration”);
- 13 4. Exhibits 1, 2, 4 and 5 to the Jenkins Declaration; and
- 14 5. The Declaration of Edward Kim.

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

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. And pursuant to this Court’s December 7, 2011
22 order (Dkt No. 455), proposed public redacted versions of the documents listed above are attached
23 hereto as exhibits.

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DATED: December 14, 2011

QUINN EMANUEL URQUHART &
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By /s/ Victoria Maroulis

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