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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.
 25

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE
 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. Confidential portions of Samsung's Response to Apple's Opening Claim
6 Construction Brief; and
- 7 2. Exhibits B, I, J, M, N, O, and S attached to the Declaration of Todd M. Briggs in
8 Support of Samsung's Response to Apple's Opening Claim Construction Brief.

9 Samsung has established good cause to permit filing these documents under seal through
10 the Declaration of Brian E. Mack in Support of Samsung's Administrative Motion to File
11 Documents Under Seal, filed herewith. In short, the above documents discuss and refer to
12 documents and things that Apple, Inc. has designated as confidential or highly confidential under
13 the interim protective order.

14 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court
15 for in camera review and served on all parties. Pursuant to this Court's December 7, 2011 order
16 (Dkt No. 455), proposed public redacted versions of the documents listed above are attached
17 hereto as exhibits if appropriate.

18
19 DATED: December 22, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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22 By /s/ Victoria Maroulis

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