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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.
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, and the Court's Order of
2 December 20, 2011 (Dkt. No. 515), defendants Samsung Electronics Co. Ltd., Samsung
3 Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively,
4 "Samsung") hereby bring this administrative motion for an order to seal:

- 5 1. The confidential, unredacted version of Exhibit X of the Declaration of Mark Tung
6 in Support of Samsung's Notice of Lodging of Materials In Opposition to Apple's
7 Motion for Preliminary Injunction (the "Tung Declaration").

8 Samsung has established good cause to permit filing these documents under seal through
9 the Declaration of Melissa N. Chan in support of this motion, filed herewith. Samsung also
10 expects that pursuant to Civil Local Rule 79-5(d), Apple will file a declaration establishing good
11 cause to permit the sealing of this document. Apple does not oppose this motion.

12 Pursuant to General Order No. 62, Samsung's entire filing, including the complete,
13 unredacted version of Exhibit X of the Tung Declaration, will be lodged with the Court for in
14 camera review and served on all parties.

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16 DATED: December 27, 2011

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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19 By /s/ Victoria F. Maroulis

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21 LTD., SAMSUNG ELECTRONICS AMERICA,
22 INC., and SAMSUNG
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