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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**

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 Notice of Motion and Motion to Compel Apple  
6 to Produce Documents and Things; Memorandum of Points and Authorities in  
7 Support Thereof;
  - 8 a. Confidential portions of the Declaration of Diane C. Hutnyan in Support of  
9 Samsung’s Motion to Compel Apple to Produce Documents and Things;
  - 10 b. Exhibits A, B, D, J-Z, AA-CC of the Declaration of Diane C. Hutnyan in  
11 Support of Samsung’s Motion to Compel Apple to Produce Documents and  
12 Things;
- 13 2. Confidential portions of Samsung’s Renewed Motion to Compel Discovery  
14 Relating to Mac OS 10.0; Memorandum of Points and Authorities in Support  
15 Thereof;
  - 16 a. Exhibits A-C of the Declaration of Diane C. Hutnyan in Support of  
17 Samsung’s Renewed Motion to Compel Discovery Relating to Mac OS  
18 10.0;
- 19 3. Confidential portions of Samsung’s Motion to Enforce Various Court Orders  
20 Requiring the Production of Materials Relevant to Apple’s Asserted Design  
21 Patents; Memorandum of Points and Authorities in Support Thereof;
  - 22 a. Exhibits C, D, F and I of the Declaration of Diane C. Hutnyan in Support of  
23 Samsung’s Motion to Enforce Various Court Orders Requiring the  
24 Production of Materials Relevant to Apple’s Asserted Design Patents;
- 25 4. Confidential portions of Samsung’s Motion for Clarification Regarding the Court’s  
26 December 22, 2011 Order (Dkt No. 535);

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- a. Confidential portions of the Declaration of Brett Arnold in support of Samsung’s Motion for Clarification Regarding the Court’s December 22, 2011 Order (Dkt No. 535);
- b. Exhibits A-J of the Declaration of Brett Arnold in Support of Samsung’s Motion for Clarification Regarding the Court’s December 22, 2011 Order (Dkt No. 535);

5. Samsung’s Notice of Motion and Motion for a Protective Order

Exhibits B-K of the Declaration of Diane C. Hutnyan in Support of Samsung's Motion for a Protective Order Samsung has established good cause to permit filing these documents under seal through the Declaration of Bill Trac in Support of Samsung’s Administrative Motion to File Documents Under Seal, filed herewith. In short, the above documents discuss and refer to documents and things that Apple has designated as highly confidential under the interim protective order. Samsung expects that Apple will file the necessary declaration validating these designations.

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

DATED: January 10, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria Maroulis  
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