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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.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE  
 MOTION TO FILE UNDER SEAL ITS  
 OPPOSITION TO APPLE'S MOTION TO  
 COMPEL DOCUMENTS AND THINGS**

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 to  
6 Compel Documents and Things ("Samsung's Opposition");
- 7 2. The confidential, unredacted version of the Declaration of Melissa Chan in Support  
8 of Samsung's Opposition to Apple's Motion to Compel Documents and Things,  
9 dated January 17, 2012 (the "Chan Declaration");
- 10 3. Exhibits 1 and 4 to the Chan Declaration; and
- 11 4. The Declaration of Hankil Kang in Support of Samsung's Opposition to Apple's  
12 Motion to Compel Documents and Things, dated January 17, 2012 (the "Kang  
13 Declaration").

14 Samsung has established good cause to permit filing these documents under seal through  
15 the Declaration of Melissa Chan in support of this administrative motion, filed herewith.

16 Pursuant to General Order No. 62, Samsung's entire filing, including Samsung's  
17 Opposition, the Kang Declaration, the Chan Declaration, and Exhibits 1 and 4 to the Chan  
18 Declaration, will be lodged with the Court for in camera review and served on all parties. A  
19 proposed redacted version of the entire filing is attached as an exhibit to this motion.

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1 DATED: January 17, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

4 By /s/ Victoria F. Maroulis

Charles K. Verhoeven

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Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

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