

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

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 UNDER SEAL ITS
 OPPOSITION TO APPLE'S MOTION TO
 COMPEL RELATING TO
 AFFIRMATIVE DEFENSES/
 COUNTERCLAIMS**

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 Relating to Affirmative Defenses/Counterclaims ("Samsung's
7 Opposition");
- 8 2. The confidential, unredacted version of the Declaration of Melissa Chan dated
9 January 17, 2012 (the "Chan Declaration");
- 10 3. Exhibits 1, 2, 7, 8, 9, 10, 11 to the Chan Declaration; and
- 11 4. The confidential, unredacted version of the Declaration of Rosa Kim dated January
12 17, 2012 (the "Kim Declaration").

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

15 Pursuant to General Order No. 62, Samsung's entire filing, including the complete,
16 unredacted version of Samsung's Opposition, the Kim Declaration, the Chan Declaration and
17 Exhibits 1, 2, 7, 8, 9, 10, 11 to the Chan Declaration, will be lodged with the Court for in camera
18 review and served on all parties. A proposed redacted version of the entire filing is attached as
19 an exhibit to this motion.

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1 DATED: January 17, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria F. Maroulis
Charles K. Verhoeven
Kevin P.B. Johnson
Victoria F. Maroulis
Michael T. Zeller
Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
INC., and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC