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13 Attorneys for SAMSUNG ELECTRONICS
 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 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. Samsung's Motion to Supplement Invalidity Contentions;
- 6 2. Exhibits O-W to the Declaration of Alex Baxter in Support of Samsung's Motion to
7 Supplement Invalidity Contentions; and
- 8 3. Exhibits 7-8 to the Declaration of Todd Briggs in Support of Samsung's Motion to
9 Supplement Invalidity Contentions.

10 Samsung has established good cause to permit filing these documents under seal through
11 the Declaration of Bill Trac in Support of Samsung's Administrative Motion to File Documents
12 Under Seal, filed herewith. In short, the above documents discuss and refer to documents and
13 things that the parties and/or third parties have designated as confidential under the interim
14 protective order, or contain confidential business information of Apple, Synaptics Corporation or
15 Cirque Corporation.

16 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court
17 for in camera review and served on all parties. Proposed redacted versions of these documents
18 are attached as exhibits to this motion.

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20 DATED: January 26, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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23 By /s/ Victoria Maroulis

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INC., and SAMSUNG

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