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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.
 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. Exhibit 4 to the Declaration of Todd Briggs in Support of Samsung's Motion to
6 Supplement Invalidity Contentions.

7 Samsung has established good cause to permit filing these documents under seal through
8 the Declaration of Alex Baxter in Support of Samsung's Administrative Motion to File Documents
9 Under Seal, filed herewith. The above document contains source code that Apple has designated
10 as confidential under the interim protective order.

11 Pursuant to General Order No. 62, Samsung's filing will be lodged with the Court for in
12 camera review and served on all parties. A proposed redacted version of this document is
13 attached as an exhibit to this motion.

14
15 DATED: January 27, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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18 By /s/ Victoria Maroulis

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