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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**

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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 Unopposed Motion for Issuance of a Request for Judicial Assistance.
- 6 2. Exhibits 1-6 of the Declaration of Sam Stake in Support of Samsung's Unopposed
7 Motion for Issuance of a Request for Judicial Assistance.

8 Samsung has established good cause to permit filing these documents under seal through
9 the Declaration of Sam Stake in Support of Samsung's Administrative Motion to File Documents
10 Under Seal, filed herewith. The above documents contains emails and deposition testimony that
11 Apple has designated as confidential under the interim protective order.

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

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16 DATED: February 3, 2012

QUINN EMANUEL URQUHART &
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19 By /s/ Victoria Maroulis
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