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 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. The confidential, unredacted version of Samsung’s Motion for a Protective Order
6 Precluding the Depositions of Ten High-Ranking Samsung Executives; and
- 7 2. Exhibits A, B, and E to M to the Declaration of Rachel Kassabian in Support of
8 Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-
9 Ranking Samsung Executives.
- 10 3. The Declarations of Gee Sung Choi, Jong Hyun Shin, Dale Sohn, Joseph Cheong,
11 Seunghwan Cho, WonPyo Hong, Heonbae Kim, Jaewan Chi in Support of
12 Samsung’s Motion for a Protective Order Precluding the Depositions of Ten High-
13 Ranking Samsung Executives.
- 14 4. The Declaration of Samuel Lee in Support of Samsung’s Motion for a Protective
15 Order Precluding the Depositions of Ten High-Ranking Samsung Executives.

16 Samsung has established good cause to permit filing these documents under seal through
17 the Declaration of Hankil Kang in Support of Samsung’s Administrative Motion to File
18 Documents Under Seal, filed herewith. In short, the above documents discuss, refer to, or
19 comprise excerpts of depositions that Samsung has designated as HIGHLY CONFIDENTIAL –
20 ATTORNEY’S EYES ONLY under the protective order, or are declarations describing the duties
21 of high-ranking executives and the confidential business structure and practices of Samsung.

22 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
23 for in camera review and served on all parties. A proposed redacted version of Samsung’s
24 Motion for a Protective Order Precluding the Depositions of Ten High-Ranking Samsung
25 Executives is attached as Exhibit 1 to this motion.

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DATED: February 23, 2012

QUINN EMANUEL URQUHART &
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