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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.
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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 Opposition To Apple’s Motion
6 For Rule 37(B)(2) Sanctions For Samsung's Violation Of Two Discovery Orders
7 (“Samsung’s Opposition to Apple’s Motion for Sanctions”);
- 8 2. The confidential, unredacted version of the Declaration of Sara Jenkins in Support
9 of Samsung’s Opposition To Apple’s Motion For Rule 37(B)(2) Sanctions For
10 Samsung's Violation Of Two Discovery Orders;
- 11 3. Exhibits A, C-F, H-N to the Declaration of Sara Jenkins in Support of Samsung’s
12 Opposition to Apple’s Motion for Sanctions; and
- 13 4. The Declaration of Hankil Kang in Support of Samsung’s Opposition to Apple’s
14 Motion For Rule 37(B)(2) Sanctions.

15 Samsung has established good cause to permit filing these documents under seal through
16 the Declaration of Melissa Chan in Support of Samsung’s Administrative Motion to File
17 Documents Under Seal, filed herewith. In short, the above documents discuss, refer to, or
18 comprise excerpts of depositions and/or documents that Samsung has designated as HIGHLY
19 CONFIDENTIAL – ATTORNEY’S EYES ONLY under the protective order, or is a declaration
20 describing the confidential business structure, practices, and documents of Samsung. The
21 remaining documents discuss and refer to documents and things that Apple has designated as
22 CONFIDENTIAL — ATTORNEYS EYES ONLY under the protective order; Samsung trusts that
23 Apple will file the necessary declaration validating these designations per Local Rule 79-5(d).

24 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
25 for in camera review and served on all parties. A proposed redacted version of Samsung’s
26 Opposition to Apple’s Motion for Sanctions has been filed concurrently with this motion.

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DATED: February 24, 2012

QUINN EMANUEL URQUHART &
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By /s/ Victoria Maroulis

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