

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
 Charles K. Verhoeven (Cal. Bar No. 170151)
 2 charlesverhoeven@quinnemanuel.com
 50 California Street, 22nd Floor
 3 San Francisco, California 94111
 Telephone: (415) 875-6600
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)
 kevinjohnson@quinnemanuel.com
 6 Victoria F. Maroulis (Cal. Bar No. 202603)
 victoriamaroulis@quinnemanuel.com
 7 555 Twin Dolphin Drive 5th Floor
 Redwood Shores, California 94065
 8 Telephone: (650) 801-5000
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)
 10 michaelzeller@quinnemanuel.com
 865 S. Figueroa St., 10th Floor
 11 Los Angeles, California 90017
 Telephone: (213) 443-3000
 12 Facsimile: (213) 443-3100

13 Attorneys for SAMSUNG ELECTRONICS
 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. The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion
6 to Compel Apex Witnesses; and
- 7 2. The confidential, unredacted version of the Declaration of Joby Martin In Support
8 Of Samsung’s Opposition To Apple’s Motion To Compel Apex Witnesses.

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

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 1 and 2 respectively to the Declaration of Hankil Kang in Support of this
19 motion.

20 DATED: March 5, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

21
22
23 By /s/ Victoria Maroulis

Charles K. Verhoeven

Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC