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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. Samsung’s Motion to Compel Production of Documents Relating to Apple’s
6 Efforts to Obtain Design Patents Related to the Patents-In-Suit (“Samsung’s
7 MTC”);
- 8 2. Declaration of Diane C. Hutnyan in Support of Samsung’s Motion to Compel
9 Production of Documents Relating to Apple’s Efforts to Obtain Design Patents
10 Related to the Patents-In-Suit (“Hutnyan Declaration”);
- 11 3. Exhibit B to the Hutnyan Declaration; and
- 12 4. Exhibit F to the Hutnyan Declaration.

13 The above items contain materials that Apple, Inc. (“Apple”) has designated as
14 confidential under the protective order entered in this case. Samsung expects that Apple will file
15 a declaration establishing good cause to permit the sealing of these materials pursuant to Civil
16 Local Rule 79-5(d).

17 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
18 for in camera review and served on all parties. Proposed redacted versions of Samsung’s MTC
19 and the Hutnyan Declaration are attached as Exhibits 1-2 to this motion.

20 DATED: March 6, 2012

QUINN EMANUEL URQUHART &
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23 By /s/ Victoria Maroulis

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INC., and SAMSUNG

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