

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
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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 ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

Date: April 3, 2012
 Time: 10:00 a.m.
 Place: Courtroom 5, 4th Floor
 Judge: Hon. Paul S. Grewal

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 the following:

- 5 1. The confidential, unredacted version of Samsung's Opposition to Apple's Motion
6 for Rule 37(b)(2) Sanctions for Samsung's Alleged Violation of January 27, 2012
7 Damages Discovery Order (“Samsung’s Opposition to Apple’s Motion for
8 Sanctions”);
- 9 2. The confidential, unredacted version of the Declaration of Joby Martin in Support
10 of Samsung's Opposition to Apple's Motion for Sanctions, and Exhibits 2 – 9
11 thereto;
- 12 3. Exhibits 5 and 6 to the Declaration of John S. Gordon in Support of Samsung's
13 Opposition to Apple's Motion for Sanctions;
- 14 4. Exhibits 1, 3, 4, 7, 9, 10 and 12 to the Declaration of Christopher E. Price in
15 Support of Samsung's Opposition to Apple's Motion for Sanctions; and
- 16 5. The confidential, unredacted version of the Declaration of Timothy Sheppard in
17 Support of Samsung's Opposition to Apple's Motion for Sanctions, and Exhibits A
18 – F thereto.

19 Samsung has established good cause to permit filing these documents under seal through
20 the Declaration of Joby Martin in Support of Samsung’s Administrative Motion to File Documents
21 Under Seal, filed herewith. In short, the above documents discuss, refer to, or comprise excerpts
22 of documents that Samsung has designated as **HIGHLY CONFIDENTIAL – ATTORNEY’S**
23 **EYES ONLY** under the protective order. The remaining documents discuss and refer to
24 documents and things that Apple has designated as **HIGHLY CONFIDENTIAL — ATTORNEYS**
25 **EYES ONLY** under the protective order; Samsung trusts that Apple will file the necessary
26 declaration validating these designations per Local Rule 79-5(d).

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

DATED: March 12, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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