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 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 Reply in Support of its Motion
6 for a Protective Order.
- 7 2. The confidential, unredacted version of the Declaration of Hankil Kang in Suport
8 of Samsung’s Reply in Support of its Motion for a Protective Order
- 9 3. Exhibits B, D, K-L, P-U to the Declaration of Rachel Herrick Kassabian in Support
10 of Samsung’s Reply in Support of its Motion for a Protective Order.

11 Items (1), (2), and Exhibits B, D, T, and U listed in item (3) discuss, refer to, or comprise
12 documents and excerpts of depositions that Samsung has designated as HIGHLY
13 CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the protective order. Samsung has
14 established good cause to permit filing these documents under seal through the Declaration of
15 Hankil Kang in Support of Samsung’s Administrative Motion to File Documents Under Seal, filed
16 herewith.

17 In addition, Exhibits K-L and P-S listed in item (3) contain materials that Apple, Inc.
18 (“Apple”) has designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under
19 the protective order. Samsung expects that Apple will file a declaration establishing good cause
20 to permit the sealing of these materials pursuant to Civil Local Rule 79-5(d).

21 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
22 for in camera review and served on all parties. A proposed redacted version of Samsung’s Reply
23 and the Declaration of Hankil Kang in Support of Samsung’s Reply are attached as Exhibits 1 and
24 2 to the Declaration of Hankil Kang in Support of Samsung’s Motion to File Documents Under
25 Seal.

1 DATED: March 19, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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