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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. The confidential, unredacted version of Samsung’s Opposition to Apple’s Motion
6 for Partial Summary Judgment.
- 7 2. The confidential, undedacted version of the Declaration of David Hecht in Support
8 of Samsung’s Opposition.
- 9 3. Exhibits H, J1-J11, K1-K3, L, M, P1-P2, and S1-S2 to the Declaration of David
10 Hecht in Support of Samsung’s Opposition.

11 Samsung has established good cause to permit filing items 1-3 under seal through the
12 Declaration of Bill Trac in Support of Samsung’s Administrative Motion to File Documents Under
13 Seal, filed herewith. In short, the above documents discuss, refer to, or comprise confidential
14 licensing information that Samsung has designated as HIGHLY CONFIDENTIAL –
15 ATTORNEY’S EYES ONLY under the protective order.

16 Item 4 contains materials that Apple has designated as confidential under the protective
17 order. Samsung expects that pursuant to Civil Local Rule 79-5(d), Apple will file a declaration
18 establishing good cause to permit the sealing of these materials.

19 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
20 for in camera review and served on all parties. A proposed redacted version of items 1-2 above
21 are attached as Exhibits 1 and 2 to this motion.

1 DATED: April 2, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

4 By /s/ Victoria Maroulis

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LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC

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