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LTD., SAMSUNG ELECTRONICS AMERICA,  
15 INC. and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC  
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17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19  
20 APPLE INC., a California corporation,

21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a  
Korean business entity; SAMSUNG  
24 ELECTRONICS AMERICA, INC., a New  
York corporation; SAMSUNG  
25 TELECOMMUNICATIONS AMERICA,  
LLC, a Delaware limited liability company,

26 Defendant.  
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S NOTICE OF *IN CAMERA*  
LODGING OF MATERIALS IN  
SUPPORT OF SAMSUNG'S MOTION TO  
COMPEL PRODUCTION OF  
MATERIALS FROM RELATED  
PROCEEDINGS AND TO ENFORCE THE  
DECEMBER 22, 2011 COURT  
ORDER; AND REQUEST FOR ORDER  
PLACING MATERIALS IN THE  
RECORD**

28 Case No. 11-cv-01846-LHK

SAMSUNG'S NOTICE OF IN CAMERA LODGING OF MATERIALS IN SUPPORT OF SAMSUNG'S MOTION  
TO COMPEL PRODUCTION AND TO ENFORCE THE DECEMBER 22, 2011 COURT  
ORDER: AND REQUEST FOR ORDER PLACING MATERIALS IN RECORD

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Samsung Electronics Co., Ltd., Samsung Electronics  
3 America, Inc. and Samsung Telecommunications America, LLC (collectively, "Samsung") is  
4 hereby lodging an *in camera* submission with the Court consisting of the February 15, 2012  
5 deposition of Christopher Stringer and the February 9, 2012 deposition of Douglas Satzger,  
6 conducted in a related proceeding involving Samsung and Apple, Inc. ("Apple") before the  
7 International Trade Commission captioned In re Certain Electronic Digital Media Devices And  
8 Components Thereof, Inv. No. 337-TA-796 (the "796 Investigation"). Samsung also lodges the  
9 exhibits to these depositions. Apple has previously consented to *in camera* submission of  
10 deposition transcripts from the 796 Investigation. See Dkt. 839-5.

11 Samsung maintains its objection to the adjudication of its motion without including any  
12 portion of the relevant 796 Investigation deposition transcripts in the record, because it believes an  
13 understanding of the content and significance of the relevant testimony will likely assist the Court  
14 in its consideration of Samsung's motion. Further, as stated in Samsung's Reply Memorandum In  
15 Support of Samsung's Motion to Compel Production of Materials From Related Proceedings and  
16 to Enforce the December 22, 2011 Court Order, Dkt. 839, *in camera* submission of these  
17 deposition transcripts is insufficient for a number of reasons, not the least of which is that it fails  
18 to establish a proper record so that these documents may be reviewed by the District or Circuit  
19 Courts as part of their consideration of this or related motions, or of an appeal. However, because  
20 the *only* use that Apple will permit Samsung with respect to submission of the content of these  
21 transcripts to this Court is a direct *in camera* submission, Samsung offers a narrowly tailored *in*  
22 *camera* submission of certain transcripts and exhibits, and requests that the Court enter an order  
23 placing these transcripts in the Court record.

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DATED: April 6, 2011

Respectfully submitted,

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

*By/s/ Victoria Maroulis*

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