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 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 9, 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 Supplemental Response to
6 Apple's Corrected Reply in Support of Rule 37(b)(2) Motion re: Samsung's Alleged
7 Violation of January 27, 2012 Damages Discovery Order (“Samsung’s
8 Supplemental Response to Apple’s Motion for Sanctions”);
- 9 2. Exhibits A, B, C, I, J, and K to the Declaration of Christopher E. Price in Support
10 of Samsung’s Supplemental Response to Apple’s Motion for Sanctions; and
- 11 3. The Declaration of Beomjoon Kim in Support of Samsung’s Supplemental
12 Response to Apple’s Motion for Sanctions.

13 Samsung has established good cause to permit filing these documents under seal through
14 the Declaration of Joby Martin in Support of Samsung’s Administrative Motion to File Documents
15 Under Seal, filed herewith. In short, the above documents discuss, refer to, or comprise excerpts
16 of documents that Samsung has designated as **HIGHLY CONFIDENTIAL – ATTORNEY’S**
17 **EYES ONLY** under the Protective Order. Additionally, the Declaration of Beomjoon Kim in
18 Support of Samsung’s Supplemental Response to Apple’s Motion for Sanctions contains highly
19 sensitive information regarding the reporting structure and organization of Samsung and
20 Samsung’s database of confidential financial information.

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
23 Supplemental Response to Apple’s Motion for Sanctions has been filed concurrently with this
24 motion.

1 DATED: April 7, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria Maroulis

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INC., and SAMSUNG
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