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13 Attorneys for SAMSUNG ELECTRONICS
 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.
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CASE NO. 11-cv-01846-LHK

**SAMSUNG'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

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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 Motion for Clarification
6 Regarding the Court's May 4, 2012 Order("Samsung's Motion for Clarification");
- 7 2. The confidential, unredacted version of the Declaration of Mark Tung In Support of
8 Samsung's Motion for Clarification ("Tung Declaration"); and
- 9 3. Exhibits 3 – 11 and 16 – 18 to the Tung Declaration.

10 Samsung has established good cause to permit filing these documents under seal through
11 the Declaration of Joby Martin in Support of Samsung's Administrative Motion to File Documents
12 Under Seal, filed herewith. In short, the above documents discuss, refer to, or comprise
13 interrogatory objections and responses that Samsung has designated as HIGHLY
14 CONFIDENTIAL — ATTORNEYS' EYES ONLY under the protective order.

15 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court
16 for *in camera* review and served on all parties. A proposed redacted version of Samsung's
17 Motion for Clarification Regarding the Court's May 4, 2012 Order has been filed concurrently
18 with this motion.

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20 DATED: May 15, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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23 By /s/ Victoria Maroulis

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LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

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