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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**

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 Motion for Summary Judgment  
6 (“the Motion”);
- 7 2. The confidential, unredacted version of the Declaration of Brett Arnold in Support  
8 of the Motion;
- 9 3. Exhibits 1-3, 14-18, 21, 27, 37-53, 55-61, 63-69, and 71-80 to the Declaration of  
10 Brett Arnold in Support of the Motion;
- 11 4. The confidential, unredacted version of the Declaration of Andries van Dam in  
12 Support of the Motion;
- 13 5. Exhibits 2, 3 and 4 to the Declaration of Andries van Dam in Support of the  
14 Motion;
- 15 6. The confidential, unredacted version of the Declaration of Clifton Forlines in  
16 Support of the Motion;
- 17 7. The confidential, unredacted version of the Declaration of Brian von Herzen in  
18 Support of the Motion;
- 19 8. Exhibits 9, 10, 16, and 18-20 to the Declaration of Brian von Herzen in Support of  
20 the Motion;
- 21 9. The confidential, unredacted version of the Declaration of Stephen Gray in Support  
22 of the Motion;
- 23 10. Exhibits 3, 6-15, and 17 to the Declaration of Stephen Gray in Support of the  
24 Motion.

25 In short, the above documents discuss, refer to, or comprise excerpts of documents that  
26 Samsung or Apple have designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES  
27 ONLY under the Protective Order. Samsung has established good cause to permit filing these  
28 documents under seal through the Declaration of Bill Trac in Support of Samsung’s

1 Administrative Motion to File Documents Under Seal, filed herewith. Samsung further expects  
2 Apple to file a declaration under Local Rule 79-5(d) establishing good cause for filing documents  
3 it has marked confidential.

4 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court  
5 for *in camera* review and served on all parties. A proposed redacted version of Samsung's  
6 Motion for Summary Judgment has been filed concurrently with this motion.

7 DATED: May 17, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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By /s/ Victoria Maroulis

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LTD., SAMSUNG ELECTRONICS AMERICA,  
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