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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 ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

Date: June 26, 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 Motion to Strike Expert
6 Testimony Based on Undisclosed Facts and Theories (“Samsung’s Motion to
7 Strike”);
- 8 2. Exhibits E, H, K, L, M, O, R, T, U, V, and X attached to the Declaration of James
9 J. Ward in Support of Samsung's Motion to Strike; and
- 10 3. The confidential, unredacted version of the Declaration of Christopher E. Price in
11 Support of Samsung's Motion to Strike, and Exhibits B-GG thereto.

12 Samsung has established good cause to permit filing these documents under seal through
13 the Declaration of James J. Ward in Support of Samsung’s Administrative Motion to File
14 Documents Under Seal, filed herewith. In short, the above documents discuss, refer to, or
15 comprise excerpts of documents that Apple has designated as HIGHLY CONFIDENTIAL –
16 ATTORNEY’S EYES ONLY under the protective order; Samsung trusts that Apple will file the
17 necessary declaration validating these designations per Local Rule 79-5(d).

18 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
19 for in camera review and served on all parties. A proposed redacted version of Samsung’s
20 Motion to Strike has been filed concurrently with this motion.

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DATED: May 17, 2012

QUINN EMANUEL URQUHART &
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By /s/ Victoria Maroulis
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