

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
 Charles K. Verhoeven (Cal. Bar No. 170151)  
 2 charlesverhoeven@quinnemanuel.com  
 50 California Street, 22nd Floor  
 3 San Francisco, California 94111  
 Telephone: (415) 875-6600  
 4 Facsimile: (415) 875-6700

5 Kevin P.B. Johnson (Cal. Bar No. 177129)  
 kevinjohnson@quinnemanuel.com  
 6 Victoria F. Maroulis (Cal. Bar No. 202603)  
 victoriamaroulis@quinnemanuel.com  
 7 555 Twin Dolphin Drive 5th Floor  
 Redwood Shores, California 94065  
 8 Telephone: (650) 801-5000  
 Facsimile: (650) 801-5100

9 Michael T. Zeller (Cal. Bar No. 196417)  
 10 michaelzeller@quinnemanuel.com  
 865 S. Figueroa St., 10th Floor  
 11 Los Angeles, California 90017  
 Telephone: (213) 443-3000  
 12 Facsimile: (213) 443-3100

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.  
 25

CASE NO. 11-cv-01846-LHK

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

26  
 27  
 28

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 to Enforce April 12,  
6 2012 Order; and
- 7 2. Exhibits 12 – 22 to the Declaration of Diane C. Hutnyan in Support of Samsung's  
8 Motion to Enforce April 12, 2012 Order.

9 In short, the above documents discuss, refer to, or comprise interrogatory objections and  
10 responses that Apple has designated as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES  
11 ONLY under the protective order; Samsung trusts that Apple will file the necessary declaration  
12 validating these designations per Local Rule 79-5(d).

13 Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court  
14 for *in camera* review and served on all parties. A proposed redacted version of Samsung's  
15 Samsung's Motion to Enforce April 12, 2012 Order has been filed concurrently with this motion.

16  
17 DATED: May 22, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

18  
19  
20 By /s/ Victoria Maroulis

Charles K. Verhoeven

Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

21 Attorneys for SAMSUNG ELECTRONICS CO.,  
22 LTD., SAMSUNG ELECTRONICS AMERICA,  
23 INC., and SAMSUNG  
24 TELECOMMUNICATIONS AMERICA, LLC  
25  
26  
27  
28