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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**

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 Opposition to Apple’s Motion
6 Pursuant to Rule 62(c) For Entry of Preliminary Injunction Without Further
7 Hearing (“the Opposition”);
- 8 2. Exhibits 1, 2, and 4 to the Declaration of Carl Anderson in Support of the
9 Opposition (“Anderson Declaration”);
- 10 3. The confidential, unredacted version of the Declaration of Paul Chapple in Support
11 of the Opposition (“Chapple Declaration”); and
- 12 4. The confidential, unredacted version of the Declaration of Travis Merrill in Support
13 of the Opposition (“Merrill Declaration”).

14 In short, the above documents discuss, refer to, or comprise excerpts of documents that
15 Samsung or Apple have designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
16 ONLY under the Protective Order. Apple has designated Exhibits 1 and 2 to the Anderson
17 Declaration HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY. Samsung expects that
18 Apple will file a declaration pursuant to Civil L.R. 79-5(d) establishing good cause to seal these
19 documents. Samsung has established good cause to permit filing Exhibit 4 to the Anderson
20 Declaration and the confidential unredacted versions of the Opposition, Chapple Declaration, and
21 Merrill Declaration under seal through the Declaration of Hankil Kang in Support of Samsung’s
22 Administrative Motion to File Documents Under Seal, filed herewith.

23 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
24 for *in camera* review and served on all parties. Proposed redacted versions of the Opposition, the
25 Chapple Declaration, and the Merrill Declaration have been filed concurrently with this motion.

1 DATED: May 25, 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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