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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.  
 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 Motion for Leave to Seek  
6 Reconsideration of the Court’s May 21, 2012 (“the Motion”);
- 7 2. The confidential, unredacted version of the Declaration of Thomas Watson in  
8 Support of the Motion (“Watson Declaration”); and
- 9 3. Exhibits 1-16 to the Watson Declaration.

10 In short, the above documents discuss, refer to, or comprise excerpts of documents that has  
11 been designated as HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY under the  
12 Protective Order. This Administrative Motion is supported by Declaration of Hankil Kang In  
13 Support of Samsung’s Administrative Motion to File Documents Under Seal. For those  
14 documents designated as confidential by Apple, Samsung expects Apple will file a declaration  
15 under Local Rule 79-5(d) establishing good cause for filing these documents under seal.

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

19 DATED: May 25, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

22 By /s/ Victoria Maroulis

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28 LTD., SAMSUNG ELECTRONICS AMERICA,  
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