

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.  
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CASE NO. 11-cv-01846-LHK

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

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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 for Adverse Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 7 2. The confidential, unredacted version of the Declaration of Hankil Kang in Support  
8 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
9 to Samsung’s Spoliation of Evidence;
- 10 3. The confidential, unredacted version of the Declaration of Byungil Kim in Support  
11 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
12 to Samsung’s Spoliation of Evidence;
- 13 4. The confidential, unredacted version of the Declaration of Young-jo Lim in  
14 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
15 Instructions Due to Samsung’s Spoliation of Evidence;
- 16 5. The confidential, unredacted version of the Declaration of Giho Ro in Support of  
17 Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to  
18 Samsung’s Spoliation of Evidence;
- 19 6. The confidential, unredacted version of the Declaration of Han-Yeol Ryu in  
20 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
21 Instructions Due to Samsung’s Spoliation of Evidence;
- 22 7. The confidential, unredacted version of the Declaration of Heontae Son in Support  
23 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
24 to Samsung’s Spoliation of Evidence;
- 25 8. The confidential, unredacted version of the Declaration of Se-Hyun Cho in Support  
26 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
27 to Samsung’s Spoliation of Evidence;

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- 9. The confidential, unredacted version of the Declaration of Nara Cho in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 10. The confidential, unredacted version of the Declaration of Michael Finnegan in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 11. The confidential, unredacted version of the Declaration of Woo-up Kwon in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 12. The confidential, unredacted version of the Declaration of Ioi Lam in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 13. The confidential, unredacted version of the Declaration of Don Joo Lee in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 14. The confidential, unredacted version of the Declaration of Kang Hyun Lee in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 15. The confidential, unredacted version of the Declaration of Kyu Hyuk Lee in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 16. The confidential, unredacted version of the Declaration of Minhyouk Lee in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;
- 17. The confidential, unredacted version of the Declaration of Sungsik Lee in Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due to Samsung’s Spoliation of Evidence;

- 1 18. The confidential, unredacted version of the Declaration of Min Cheol Schin in  
2 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
3 Instructions Due to Samsung’s Spoliation of Evidence;
- 4 19. The confidential, unredacted version of the Declaration of YoungSoon Lee in  
5 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
6 Instructions Due to Samsung’s Spoliation of Evidence;
- 7 20. The confidential, unredacted version of the Declaration of Jong-Dae Park in  
8 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
9 Instructions Due to Samsung’s Spoliation of Evidence;
- 10 21. The confidential, unredacted version of the Declaration of M. James Daley in  
11 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
12 Instructions Due to Samsung’s Spoliation of Evidence;
- 13 22. The confidential, unredacted version of the Declaration of Joo Hyuk Kang in  
14 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
15 Instructions Due to Samsung’s Spoliation of Evidence;
- 16 23. The confidential, unredacted version of the Declaration of Won Pyo Hong in  
17 Support of Opposition to Apple Inc.’s Motion for Adverse Inference Jury  
18 Instructions Due to Samsung’s Spoliation of Evidence;
- 19 24. The confidential, unredacted version of the Declaration of Alex Binder in Support  
20 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
21 to Samsung’s Spoliation of Evidence (“the Binder Declaration”);
- 22 25. Exhibits 1 to the Binder Declaration;
- 23 26. Exhibits 2-3 to the Binder Declaration;
- 24 27. The confidential, unredacted version of the Declaration of Sara Jenkins in Support  
25 of Opposition to Apple Inc.’s Motion for Adverse Inference Jury Instructions Due  
26 to Samsung’s Spoliation of Evidence; and  
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1           28.     Exhibits 1, 4-30, 32, and 33 to the Declaration of Thomas Watson in Support of  
2                     Opposition to Apple Inc.'s Motion for Adverse Inference Jury Instructions Due to  
3                     Samsung's Spoliation of Evidence.

4           In short, the above documents discuss, refer to, or comprise excerpts of documents or other  
5 information that Samsung or Apple have designated as HIGHLY CONFIDENTIAL –  
6 ATTORNEYS' EYES ONLY under the Protective Order. Apple has designated Exhibits 2 and 3  
7 to the Binder Declaration HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY.  
8 Samsung expects that Apple will file a declaration pursuant to Civil L.R. 79-5(d) establishing  
9 good cause to seal these documents. Samsung has established good cause to permit filing items  
10 1-25 and 27-28 under seal through the Declaration of Daniel Shim in Support of Samsung's  
11 Administrative Motion to File Documents Under Seal, filed herewith.

12           Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court  
13 for *in camera* review and served on all parties. Proposed redacted versions of items 1-24 and 27  
14 have been filed concurrently with this motion.

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17 DATED: May 29, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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20 By /s/ Victoria Maroulis

Charles K. Verhoeven  
Kevin P.B. Johnson  
Victoria F. Maroulis  
Michael T. Zeller

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