

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**

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 Opposition to Apple's Motion to  
6 Exclude Testimony of Samsung's Experts;
- 7 2. Exhibits D -G, I, N, O and Q to the Declaration of Joby Martin in Support of the  
8 Opposition to Exclude Testimony of Samsung's Experts;
- 9 3. The confidential, unredacted version of Samsung's Opposition to Apple's Motion to  
10 Strike Portions of Samsung's Expert Reports;
- 11 4. Exhibits B - D, G - M, P, Q, S - U, X, Y, BB, DD - FF to the Declaration of James  
12 Ward in Support of the Opposition to Apple's Motion to Strike Portions of  
13 Samsung's Expert Reports ("Ward Declaration"); and
- 14 5. Exhibits 1, 3-9, 12-17 and 20 to the Declaration of Joby Martin in Support of the  
15 Opposition to Apple's Motion to Strike Portions of Samsung's Expert Reports.

16 In short, the above documents discuss, refer to, or comprise interrogatory objections and  
17 responses that either Samsung or Apple has designated as HIGHLY CONFIDENTIAL —  
18 ATTORNEYS' EYES ONLY.

19 The documents identified below contain Apple confidential business information or have  
20 been designated by Apple as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY.  
21 Samsung expects that Apple will file the declaration require by Local Rule 79-5(d) to establish the  
22 following documents as sealable:

- 23 • Exhibits I and N to the Declaration of Joby Martin in Support of the Opposition to  
24 Exclude Testimony of Samsung's Experts;
- 25 • Exhibits H - L, T, X and Y to James Ward's Declaration in Support of Samsung's  
26 Opposition to Apple Inc.'s Motion to Strike Portions of Samsung's Expert Reports;  
27 and

28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

- Exhibits 3, 7-9, 12-17 and 20 to the Declaration of Joby Martin in Support of the Opposition to Apple's Motion to Strike Portions of Samsung's Expert Reports

Pursuant to General Order No. 62, Samsung's entire filing will be lodged with the Court for *in camera* review and served on all parties. A proposed redacted version of Samsung's exhibits have been filed concurrently with this motion.

DATED: May 31, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Victoria Maroulis  
Charles K. Verhoeven  
Kevin P.B. Johnson  
Victoria F. Maroulis  
Michael T. Zeller  
Attorneys for SAMSUNG ELECTRONICS CO.,  
LTD., SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC