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15 Attorneys for SAMSUNG ELECTRONICS CO.,
LTD., SAMSUNG ELECTRONICS AMERICA,
16 INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19
20 APPLE INC., a California corporation,
21 Plaintiff,

22 vs.

23 SAMSUNG ELECTRONICS CO., LTD., a
24 Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New
25 York corporation; SAMSUNG
TELECOMMUNICATIONS AMERICA,
26 LLC, a Delaware limited liability company,
27 Defendant.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S NOTICE OF PARTIAL
WITHDRAWAL OF RENEWED MOTION
TO FILE DOCUMENTS UNDER SEAL
(DKT. NO. 2231)**

1 PLEASE TAKE NOTICE that, pursuant to Civil Local Rule 7-7(e), having met and
2 conferred with counsel for third-party MERL, Samsung Electronics Co., Ltd., Samsung
3 Electronics America, Inc., and Samsung Telecommunications America, LLC (collectively,
4 “Samsung”) hereby partially withdraw their Renewed Administrative Motion to File Documents
5 Under Seal (Dkt. No. 2231). Samsung no longer moves to seal:

- 6
- 7 • Exhibit 6 to the Declaration of Marc Pernick in Support of Apple’s Motion to
8 Strike Samsung’s Experts Based on Undisclosed Facts and Theories (Dkt. No. 939)
9 (“Exhibit 6”).

10 In its February 1, 2013 Order, the Court found that certain portions of Exhibit 6 may be
11 sealed under the “good cause” standard since they contain third-party MERL’s source code
12 references. (Dkt. No. 2222 at 24.) Subsequently, Samsung moved to seal only the source code
13 references included in Exhibit 6. (Dkt. No. 2231 at 5.) However, third-party MERL has now
14 confirmed that it no longer considers any portion of Exhibit 6 confidential.

15 DATED: March 4, 2013

Respectfully submitted,

17 QUINN EMANUEL URQUHART &
18 SULLIVAN, LLP

By /s/ Victoria F. Maroulis

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