

1 QUINN EMANUEL URQUHART &
SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 Kevin A. Smith (Bar No. 250814)
kevinsmith@quinnemanuel.com
4 50 California Street, 22nd Floor
San Francisco, California 94111
5 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

6 Kevin P.B. Johnson (Bar No. 177129)
kevinjohnson@quinnemanuel.com
7 Victoria F. Maroulis (Bar No. 202603)
victoriamaroulis@quinnemanuel.com
8 555 Twin Dolphin Drive, 5th Floor
9 Redwood Shores, California 94065
Telephone: (650) 801-5000
10 Facsimile: (650) 801-5100

11 William C. Price (Bar No. 108542)
williamprice@quinnemanuel.com
12 Michael L. Fazio (Bar No. 228601)
michaelfazio@quinnemanuel.com
13 865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
14 Telephone: (213) 443-3000
Facsimile: (213) 443-3100

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

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

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 Defendants.

CASE NO. 11-CV-01846-LHK (PSG)

**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 to file under seal
4 the following documents:

- 5 1. Exhibit 6 to the Declaration of Robert J. Becher in Support of Samsung's Motion
6 for New Trial Regarding '381 Patent Pursuant to Fed. R. Civ. P. 59 Based on
7 Newly Discovered Evidence or, Alternatively, for Entry of Judgment on Liability;
- 8 2. Portions of the Declaration of Andries van Dam, Ph.D. in Support of Samsung's
9 Motion for New Trial Regarding '381 Patent Pursuant to Federal Rule of Civil
10 Procedure 59 Based on Newly Discovered Evidence; and
- 11 3. Portions of Samsung's Notice of Motion and Motion for New Trial Regarding '381
12 Patent Pursuant to Fed. R. Civ. P. 59 Based on Newly Discovered Evidence or,
13 Alternatively, for Entry of Judgment on Liability.

14 Samsung has established good cause to permit filing these documents under seal through
15 the Declaration of Bill Trac in Support of Samsung's Administrative Motion to File Documents
16 Under Seal ("Trac Decl."), filed herewith. In short, the above documents discuss and refer to
17 documents and things that Apple, Samsung and third parties have designated as "HIGHLY
18 CONFIDENTIAL - ATTORNEYS' EYES ONLY" and "HIGHLY CONFIDENTIAL – OUTSIDE
19 ATTORNEYS' EYES ONLY – SOURCE CODE" under the Protective Order. Samsung
20 accordingly files these documents under seal, and expects that Apple will comply with L.R. 79-
21 5(d) by filing an appropriate declaration with the Court within seven days for those portions and
22 documents that reference Apple-designated information. Samsung's entire filing will be lodged
23 with the Court for *in camera* review and served on all parties.

24
25
26
27
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

DATED: July 8, 2013

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Victoria Maroulis
Victoria F. Maroulis
Attorneys for Defendants
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
and SAMSUNG TELECOMMUNICATIONS
AMERICA, LLC