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

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
22 Korean business entity; SAMSUNG
ELECTRONICS AMERICA, INC., a New
23 York corporation; SAMSUNG
24 TELECOMMUNICATIONS AMERICA,
LLC, a Delaware limited liability company,

25 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. Portions of Samsung's Opposition to Apple's Motion For Leave to File a Surreply
6 to Samsung's Motion For New Trial Or, Alternatively, for Entry of Judgment.

7 Samsung has established good cause to permit filing these documents under seal through
8 the Declaration of Joby Martin in Support of Samsung's Administrative Motion to File Documents
9 Under Seal ("Martin Declaration"), filed herewith. In short, the above documents discuss and
10 refer to documents and things that Samsung has designated as "HIGHLY CONFIDENTIAL -
11 ATTORNEYS' EYES ONLY" and "HIGHLY CONFIDENTIAL – OUTSIDE ATTORNEYS'
12 EYES ONLY – SOURCE CODE" under the Protective Order. Samsung accordingly files these
13 documents under seal. Samsung's entire filing will be lodged with the Court for *in camera* review
14 and served on all parties.

15 DATED: August 10, 2013

16 QUINN EMANUEL URQUHART &
17 SULLIVAN, LLP

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