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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. 12-CV-00630-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. Exhibits 4-8 to the Declaration of Todd M. Briggs in Support of Samsung's Reply
6 in Support of Samsung's Motion for Leave to Amend and Supplement Its
7 Infringement Contentions ("Briggs Declaration"); and
- 8 2. Portions of Samsung's Reply in Support of Samsung's Motion for Leave to Amend
9 and Supplement Its Infringement Contentions ("Reply Brief").

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

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DATED: May 21, 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
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