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CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
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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.
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CASE NO. 11-cv-01846-LHK

**SAMSUNG’S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER TEMPORARY SEAL UNTIL
THE JURY COMPLETES ITS
DELIBERATIONS**

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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 temporarily seal until the jury completes its deliberations:

- 5 1. Samsung’s Proffer of Witness Testimony and Exhibits;
- 6 2. The Declaration of Diane Hutnyan in Support of Samsung’s Proffer of Witness
7 Testimony and Exhibits; and
- 8 3. The Declaration of Brett Arnold in Support of Samsung’s Proffer of Witness
9 Testimony and Exhibits.

10 During court proceedings on the morning of August 21, 2012, the Court directed the
11 parties to delay filing the proffers of testimony and documents that had been excluded during the
12 course of trial. (Decl. of Maroulis ISO Administrative Mot. to Seal ¶ 3; D.T. 3947:1-4 & 4072:5-
13 25.) At the end of the day, Samsung requested and was granted permission from the Court to file
14 Samsung’s Proffer and supporting declarations under temporary seal until the jury completes its
15 deliberations.¹ (Decl. of Maroulis ISO Administrative Mot. to Seal ¶ 4; D.T. 4261:3-12.)
16 Because Samsung’s Proffer of Witness Testimony and Exhibits, the Declaration of Diane Hutnyan
17 in Support of Samsung’s Proffer of Witness Testimony and Exhibits, and the Declaration of Brett
18 Arnold in Support of Samsung’s Proffer of Witness Testimony and Exhibits either discuss or
19 attach the excluded materials that the Court ordered not be made publicly available during the
20 course of trial, and the Court has granted Samsung permission to file these documents under seal
21 until jury deliberations are complete, good cause exists to seal these filings.

22 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court
23 for *in camera* review and served on all parties.

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26 ¹ In accordance with the Court’s previous instruction to file excluded exhibits by Tuesday,
27 August 21, 2012, Samsung filed excluded exhibits, most of which were not under seal, early
28 Tuesday morning. (Dkt. No. 1898) Samsung filed to comply with the Court’s deadline before
it instructed the parties not to file the exhibits that had been excluded during the course of trial.

1 DATED: August 21, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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