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

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

APPLE INC., a California corporation,

Plaintiff,

vs.

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

Defendants.

CASE NO. 11-cv-01846-LHK

**SAMSUNG'S RENEWED  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENTS UNDER SEAL**

1 Pursuant to Civil L.R. 7-11 and 79-5, General Order No. 62, and the Court's September 14,  
2 2012 Order Granting-In-Part and Denying-In-Part Motions to Seal (ECF No. 1966), Defendants  
3 Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung  
4 Telecommunications America, LLC (collectively, "Samsung") hereby bring this administrative  
5 motion for an order to seal:

- 6 1. Excerpts from Exhibit 87 to Samsung's Notice of Filing of Excluded Exhibits,  
7 containing Samsung's Demonstratives 3966.104, 3966.105, 3966.106, 3966.107,  
8 and 3966.108 (ECF 1898)
- 9 2. Excerpts from Exhibit FF of the Hutnyan Declaration containing excerpts from the  
10 Rebuttal Expert Report of Hyong S. Kim, Ph.D., Regarding Non-Infringement of  
11 the Asserted Claims of U.S. Patent No. 7,447,516, dated April 16, 2012 (ECF  
12 1682-05)

13 The above documents discuss and refer to information which Intel has designated as HIGHLY  
14 CONFIDENTIAL — ATTORNEYS' EYES ONLY, under the Protective Order. The Court has  
15 previously determined that compelling reasons exist to seal the type of confidential information  
16 included in Exhibit 87. *See* Dkt. No. 1649, at 27-28. Filed concurrently herewith are Intel's  
17 declarations under Civil Local Rule 79-5(d), establishing these document as sealable.

18 In addition, Samsung moves for an order to seal:

- 19 3. Excerpts from PX 87, the Second Expert Report on Ericsson's Cross-License Offer  
20 to Samsung, prepared for Brinkhof Advocaten by Hillebrand & Partners Consulting  
21 Engineers
- 22 4. Excerpts from PX 2065, excerpts from the deposition of Karl Heinz Rosenbrock,  
23 dated April 20, 2012

24 The above documents discuss and refer to information which Ericsson has designated as HIGHLY  
25 CONFIDENTIAL — ATTORNEYS' EYES ONLY, under the Protective Order. Samsung expects  
26 that Ericsson will file the declaration required by Civil Local Rule 79-5(d) establishing these  
27 documents as sealable.

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In addition, Samsung moves for an order to seal:

- 5. Exhibit 10 to the Declaration of Curran M. Walker in Support of Samsung's Objections and Responses Regarding Exhibits and Deposition Designations Disclosed on August 15, 2012, containing excerpts of the May 16, 2012 deposition of Microsoft employee Bryan Agnetta (ECF 1781-24)

The above document discusses and refers to information which Microsoft has designated as HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY, under the Protective Order. Samsung expects that Microsoft will file the declaration required by Civil Local Rule 79-5(d) establishing these documents as sealable.

DATED: September 21, 2012

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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