

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

5 Kathleen M. Sullivan (Cal. Bar No. 242261)  
kathleensullivan@quinnemanuel.com  
6 Kevin P.B. Johnson (Cal. Bar No. 177129)  
kevinjohnson@quinnemanuel.com  
7 Victoria F. Maroulis (Cal. Bar No. 202603)  
victoriamaroulis@quinnemanuel.com  
8 555 Twin Dolphin Drive 5th Floor  
Redwood Shores, California 94065  
9 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

10 Susan R. Estrich (Cal. Bar No. 124009)  
susanestrich@quinnemanuel.com  
11 Michael T. Zeller (Cal. Bar No. 196417)  
michaelzeller@quinnemanuel.com  
12 865 S. Figueroa St., 10th Floor  
Los Angeles, California 90017  
13 Telephone: (213) 443-3000  
14 Facsimile: (213) 443-3100

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

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

26 Defendants.  
27

CASE NO. 11-cv-01846-LHK

**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 for an order to  
4 seal:

- 5 1. Exhibit 25 to the Declaration of Susan Estrich in Support of Samsung’s Motion for  
6 Judgment as a Matter of Law, New Trial and/or Remittitur Pursuant to Federal  
7 Rules of Civil Procedure 50 and 59; Samsung’s Opposition to Apple Inc.’s Motion  
8 for Judgment as a Matter of Law (Renewed), New Trial, and Amended Judgment  
9 [FRCP 50, 59]; and Samsung’s Opposition to Apple’s Motion for a Permanent  
10 Injunction and Damages Enhancements.

11 Exhibit 25 to the Estrich Declaration consists of Trial Exhibit 78, an invoice from Intel that  
12 Apple Inc. has designated as confidential under the protective order. The Court has previously  
13 held that compelling reasons exist to seal “quantity, unit price, and amounts due to Intel in this  
14 invoice, all of which relate to capacity or financial terms of third-party agreements.” Dkt. No.  
15 1649 at 11. Samsung expects that Apple will file the declaration required by Civil Local Rule  
16 79-5(d) establishing that portions of Exhibit 25 are sealable along with a proposed redacted  
17 version of the document.

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

20 DATED: November 9, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

21  
22  
23 By /s/ Victoria Maroulis

Charles K. Verhoeven

Kevin P.B. Johnson

Victoria F. Maroulis

Michael T. Zeller

Attorneys for SAMSUNG ELECTRONICS CO.,

LTD., SAMSUNG ELECTRONICS AMERICA,

INC., and SAMSUNG

TELECOMMUNICATIONS AMERICA, LLC