

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 5<sup>th</sup> 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  
Attorneys for SAMSUNG ELECTRONICS  
15 CO., LTD., SAMSUNG ELECTRONICS  
AMERICA, INC. and SAMSUNG  
16 TELECOMMUNICATIONS AMERICA, LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

19 APPLE INC., a California corporation,

20 Plaintiff,

21 vs.

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

26 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, Samsung Electronics Co.  
2 Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC  
3 (collectively, “Samsung”) hereby bring this administrative motion for an order to seal portions of  
4 Samsung’s Motion to Compel Depositions of Apple Reply Expert Declarants (“Samsung’s Motion  
5 to Compel”).

6 Samsung’s Motion to Compel contains descriptions of the operation of confidential  
7 Samsung source code. (Declaration of Hankil Kang ¶ 2.) Disclosure of this information poses  
8 a competitive harm to Samsung as competitors can re-create the features found in Samsung’s  
9 products using the information contained in the document. (*Id.*) “Compelling reasons” to seal  
10 exist where the documents to be sealed are “sources of business information that *might harm a*  
11 *litigant’s competitive standing.*” *Nixon v. Warner Communications, Inc.*, 435 U.S. 589, 598  
12 (1978) (emphasis added). Portions of Samsung’s Motion to Compel should thus be sealed.

13 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court  
14 for *in camera* review and served on all parties. A proposed redacted version of Samsung’s  
15 Motion to Compel is filed concurrently with this motion.

16  
17 DATED: November 16, 2012

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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