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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:

- 4 1. Samsung’s Administrative Request for Leave to File Declaration of Robert J.
5 Becher Regarding Samsung’s Submission of HTC Settlement Agreement in
6 Support of Opposition to Apple's Motion for Permanent Injunction and Damages
7 Enhancement (“Samsung’s Administrative Request”); and
- 8 2. Exhibit A to Samsung’s Administrative Request.

9 The documents listed above include information Apple has designated “Highly
10 Confidential – Attorneys’ Eyes Only” under the Protective Order. Samsung expects that Apple
11 will file a declaration as required by Civil L.R. 79-5(d) establishing that the documents are
12 sealable. Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the
13 Court for *in camera* review and served on all parties.

14
15 DATED: November 30, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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17
18 By /s/ Victoria Maroulis

19 Charles K. Verhoeven
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24 LTD., SAMSUNG ELECTRONICS AMERICA,
25 INC., and SAMSUNG
26 TELECOMMUNICATIONS AMERICA, LLC
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