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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. Portions of Exhibit 1 to the Declaration of Robert J. Becher Regarding Samsung’s
5 Submission of HTC Settlement Agreement in Support of Opposition to Apple’s
6 Motion for a Permanent Injunction and Damages Enhancement (“Becher PI
7 Declaration”).

8 Exhibit 1 to the Becher PI Declaration consists of a copy of the Patent License and
9 Settlement Agreement between HTC America, Inc., HTC Corporation and S3 Graphics Co., Ltd.
10 and Apple Inc., dated November 11, 2012, which Apple has designated “Highly Confidential –
11 Attorneys’ Eyes Only” under the Protective Order. The Court has held that “only the pricing and
12 royalty terms of license agreements may be sealed.” (Dkt. No. 2179 at 2.) Counsel for
13 Samsung contacted counsel for Apple and third-party HTC regarding this filing. (Declaration of
14 Robert J. Becher in Support of Samsung’s Administrative Motion to File Documents Under Seal
15 ¶ 2.) Filed concurrently with this motion is a proposed public version of Exhibit 1 that
16 incorporates redactions HTC requested and the redactions Apple requested, which are a subset of
17 HTC’s redactions. (*Id.*) Samsung takes no position on whether the redactions are appropriate at
18 this time and expects that Apple and HTC will file declarations as required by Civil L.R. 79-5(d).
19 Pursuant to General Order No. 62, Samsung’s entire filing will be lodged with the Court for *in*
20 *camera* review and served on all parties.

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1 DATED: December 5, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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By /s/ Victoria Maroulis
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