

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

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

13 Attorneys for SAMSUNG ELECTRONICS
CO., LTD., SAMSUNG ELECTRONICS
14 AMERICA, INC. and SAMSUNG
TELECOMMUNICATIONS AMERICA, LLC
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16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

18 APPLE INC., a California corporation,

19 Plaintiff,

20 vs.

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

24 Defendants.
25

CASE NO. 11-cv-01846-LHK

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

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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 2 to the Declaration of Diane Hutnyan in Support of Samsung’s Proffer of
6 Witness Testimony and Exhibits, which consists of excerpts from reproductions of
7 confidential source code produced by Samsung in this litigation, bearing Bates
8 SAMNDCA-C00000613-1391; SAMNDCA-C00001450-1526; SAMNDCA-
9 C00001528-1908; SAMNDCA-C00001911-2265; SAMNDCA-C00002358-2476;
10 SAMNDCA-C00002481-2529; SAMNDCA-C00002559-2899; SAMNDCA-
11 C00002901-2975; SAMNDCA-C00003054-3555; SAMNDCA-C00003597-4086;
12 SAMNDCA-C00004088-4416; SAMNDCA-C00004451-4524; and SAMNDCA-
13 C00007811-8031; and
- 14 2. Exhibits A, Q, S, and T to the Declaration of Brett Arnold in Support of Samsung’s
15 Proffer of Witness Testimony and Exhibits.

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17 Exhibit 2 to the Hutnyan Declaration, consists of information Samsung has designated
18 **HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY**. Samsung has established
19 compelling reasons to seal the document through the Declaration of Prashanth Chennakesavan in
20 Support of Samsung’s Administrative Motion to File Documents Under Seal. Exhibits A, Q, S,
21 and T to the Arnold Declaration consist of documents that discuss and/or refer to information
22 which Apple has designated as **HIGHLY CONFIDENTIAL — ATTORNEYS’ EYES ONLY**
23 under the Protective Order. Samsung expects that Apple will file the declaration required by
24 Civil Local Rule 79-5(d) to permit filing under seal.

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

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1 DATED: August 21, 2012

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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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