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

**SAMSUNG'S RENEWED  
ADMINISTRATIVE MOTION TO FILE  
DOCUMENT 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 (“STA”) (collectively, “Samsung”) hereby bring this renewed administrative  
4 motion for an order to seal:

- 5 1. Portions of Exhibit 1 to the Declaration of Deok Keun Matthew Ahn in Support of  
6 Apple’s Opposition to Samsung’s Administrative Motion for Leave to File  
7 Supplemental Declaration of Stephen Gray (“Exhibit 1”).

8 Samsung filed an Administrative Motion for Leave to File the Supplemental Declaration of  
9 Stephen Gray in Support of Samsung’s Opposition to Apple’s Motion for a Permanent Injunction  
10 and Damages Enhancement. (Dkt. No. 2183.) In support of its opposition to Samsung’s  
11 Motion for Leave, Apple filed Exhibit 1, which consists of excerpts from the transcript of the  
12 December 3, 2012 deposition of Karansher Singh, Ph. D. (Dkt. No. 2187.) The Court  
13 subsequently denied Samsung’s Motion for Leave (Dkt. No. 2191) and denied without prejudice  
14 Apple’s Motion to Seal Exhibit 1. (Dkt. No. 2210.)

15 Limited portions of Exhibit 1 include detailed, highly-sensitive descriptions of the  
16 operation of Samsung’s source code. (Declaration of Hankil Kang ¶ 3, Ex. A.) Disclosure of  
17 this information is likely to cause Samsung substantial harm as competitors could use the  
18 descriptions to copy the features included Samsung’s products. (*Id.*) As the Court has  
19 previously found, source code and detailed descriptions of source code are trade secrets and are  
20 “clearly sealable” under the “compelling reasons” standard. (Dkt. No. 2168 at 13; *see also*  
21 *Agency Solutions.Com, LLC v. TriZetto Group, Inc.*, 819 F. Supp. 2d 1001, 1017 (E.D. Cal.  
22 2011).)

23 Samsung thus respectfully requests that the Court seal the limited portions of Exhibit 1  
24 identified in Exhibit A to the Kang Declaration.

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1 DATED: January 2, 2013

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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By /s/ Victoria Maroulis  
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