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 13 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

14 IN RE TFT-LCD (FLAT PANEL)  
 15 ANTITRUST LITIGATION

Master File No. C M:07-01827 SI  
 Individual Case No. C 3:11-02591 SI  
 MDL NO. 1827

16 This Document Relates to  
 17 Case C 3:11-02591 SI

18 T-MOBILE U.S.A., INC.,  
 19 Plaintiff,  
 20 v.  
 21 AU OPTRONICS CORPORATION, et al.,  
 22 Defendants.

**PLAINTIFF T-MOBILE U.S.A.,  
 INC.’S EX PARTE APPLICATION TO  
 FILE UNDER SEAL ITS  
 OPPOSITION TO SANYO CONSUMER  
 ELECTRONICS CO., LTD.’S MOTION  
 TO DISMISS T-MOBILE’S AMENDED  
 COMPLAINT**

**[Civil Local Rule 79-5]**

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 28 Master File No. C M:07-01827 SI  
 Individual Case No. C 3:11-02591 SI  
 MDL NO. 1827

*EX PARTE APPLICATION TO FILE UNDER SEAL  
 OPPOSITION TO SANYO CONSUMER  
 ELECTRONICS CO., LTD.’S MOTION TO DISMISS*

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Pursuant to Civil Local Rules 79-5 and 7-10 and the Court's Standing Order,  
3 Plaintiff T-Mobile U.S.A., Inc. ("T-Mobile"), by and through its counsel, respectfully submits  
4 this application, on an *ex parte* basis, for an order permitting it to file under seal portions of its  
5 Opposition to Sanyo Consumer Electronics Co., Ltd.'s Motion to Dismiss T-Mobile's Amended  
6 Complaint.

7 T-Mobile requests that the following document be filed under seal pursuant to  
8 Civil Local Rule 79-5(d) because it refers to documents and testimony that defendants have  
9 designated "confidential" or "highly confidential" pursuant to the Protective Order in this action  
10 (Dkt. 408, filed December 7, 2007):

- 11 • Portions of Plaintiff T-Mobile's Opposition to Sanyo Consumer  
12 Electronics Co., Ltd.'s Motion to Dismiss T-Mobile's Amended  
13 Complaint.

14 T-Mobile has lodged with the Court redacted and unredacted copies of this  
15 document in accordance with Civil Local Rule 79-5.

16 T-Mobile submits this application as the party wishing to file the document  
17 described above. T-Mobile attaches hereto the Declaration of Jason C. Rubinstein in support of  
18 this application.

19 T-Mobile takes no position on whether the designated document satisfies the  
20 requirements for sealing. Although T-Mobile's request is narrowly tailored to include only the  
21 information that may require confidentiality, it is defendants' burden to show good cause for  
22 sealing the document by submitting a declaration showing good cause and a proposed order  
23 within seven days after the lodging of the designated document. *See* Civil Local Rule 79-5(d).

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2 Dated: January 17, 2012

Respectfully submitted,

3 /s/ Brooke A. M. Taylor  
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