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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 SAMSUNG SDI
 CO., LTD. AND SAMSUNG SDI
 AMERICA, INC.’s MOTION TO
 DISMISS T-MOBILE’S CLAIMS
 PURSUANT TO CALIFORNIA’S
 CARTWRIGHT ACT AND UNFAIR
 COMPETITION LAW**

[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 SAMSUNG SDI’S
 MOTION TO DISMISS T-MOBILE’S CLAIMS.*

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 Defendants Samsung SDI Co., Ltd. and Samsung SDI America, Inc.'s Motion to
6 Dismiss T-Mobile's Claims Pursuant to California's Cartwright Act and Unfair Competition
7 Law.

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

- 12 • Portions of Plaintiff T-Mobile's Opposition to Defendants Samsung SDI
13 Co., Ltd.'s and Samsung SDI America, Inc.'s Motion to Dismiss T-
14 Mobile's Claims Pursuant to California's Cartwright Act and Unfair
Competition Law.

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

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

20 T-Mobile takes no position on whether the designated document satisfies the
21 requirements for sealing. Although T-Mobile's request is narrowly tailored to include only the
22 information that may require confidentiality, it is defendants' burden to show good cause for
23 sealing the document by submitting a declaration showing good cause and a proposed order
24 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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