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 11 ELAN MICROELECTRONICS
 CORPORATION

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION
 16

17 ELAN MICROELECTRONICS
 18 CORPORATION,

19 Plaintiff,

20 v.

21 APPLE, INC.,

22 Defendant.

Case No. 09-cv-01531 RS (PSG)

**PLAINTIFF ELAN
 MICROELECTRONICS
 CORPORATION'S ADMINISTRATIVE
 MOTION TO FILE PAPERS IN
 SUPPORT OF ITS MOTION FOR
 PARTIAL SUMMARY JUDGMENT OF
 INFRINGEMENT UNDER SEAL;
 DECLARATION OF JENNIFER LIU**

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 24 AND RELATED COUNTERCLAIMS
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1 Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiff Elan Microelectronics Corporation
2 (“Elan”) hereby requests leave of Court to file under seal the following documents which have
3 been lodged with the Clerk:

- 4 1. Elan’s Motion for Partial Summary Judgment of Infringement of U.S. Patent
5 5,875,352;
- 6 2. Declaration of Robert Dezmelyk in Support of Elan’s Motion for Partial Summary
7 Judgment of Infringement;
- 8 3. Declaration of Jennifer Liu in Support of Elan’s Motion for Partial Summary
9 Judgment of Infringement;
- 10 4. Exhibit 3 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
11 Summary Judgment of Infringement;
- 12 5. Exhibit 4 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
13 Summary Judgment of Infringement;
- 14 6. Exhibit 5 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
15 Summary Judgment of Infringement;
- 16 7. Exhibit 6 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
17 Summary Judgment of Infringement;
- 18 8. Exhibit 23 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
19 Summary Judgment of Infringement;
- 20 9. Exhibit 24 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
21 Summary Judgment of Infringement;
- 22 10. Exhibit 25 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
23 Summary Judgment of Infringement;
- 24 11. Exhibit 27 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
25 Summary Judgment of Infringement;
- 26 12. Exhibit 28 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
27 Summary Judgment of Infringement;

- 1 13. Exhibit 29 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
2 Summary Judgment of Infringement;
- 3 14. Exhibit 30 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
4 Summary Judgment of Infringement;
- 5 15. Exhibit 31 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
6 Summary Judgment of Infringement;
- 7 16. Exhibit 32 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
8 Summary Judgment of Infringement;
- 9 17. Exhibit 33 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
10 Summary Judgment of Infringement;
- 11 18. Exhibit 34 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
12 Summary Judgment of Infringement;
- 13 19. Exhibit 35 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
14 Summary Judgment of Infringement;
- 15 20. Exhibit 36 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
16 Summary Judgment of Infringement;
- 17 21. Exhibit 37 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
18 Summary Judgment of Infringement;
- 19 22. Exhibit 38 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
20 Summary Judgment of Infringement;
- 21 23. Exhibit 39 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
22 Summary Judgment of Infringement;
- 23 24. Exhibit 40 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
24 Summary Judgment of Infringement;
- 25 25. Exhibit 41 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
26 Summary Judgment of Infringement;
- 27 26. Exhibit 42 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
28 Summary Judgment of Infringement;

1 27. Exhibit 43 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
2 Summary Judgment of Infringement;

3 28. Exhibit 44 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
4 Summary Judgment of Infringement;

5 29. Exhibit 45 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
6 Summary Judgment of Infringement;

7 30. Exhibit 47 to the Declaration of Jennifer Liu in Support of Elan’s Motion for Partial
8 Summary Judgment of Infringement.

9 As grounds for this motion, Elan states that Elan’s Motion for Partial Summary Judgment
10 of Infringement, the Dezmelyk Declaration, the Liu Declaration and Exhibits 3-6, 23-25, 27-45,
11 47 to the Liu Declaration constitute, or disclose information contained in, documents designated
12 by Defendant Apple Inc. (“Apple”) as “Confidential – Attorney Eyes Only” or “Confidential –
13 Attorneys Eyes Only – Source Code” pursuant to the Amended Protective Order in this matter.
14 *See Declaration of Jennifer Liu In Support Of Plaintiff Elan Microelectronics Corporation’s*
15 *Motion To File Papers Under Seal filed concurrently herewith.* As such, Elan is obligated to file
16 those documents under seal.

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18 DATED: May 5, 2011

Respectfully submitted,
ALSTON & BIRD LLP

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By: _____ */s/ Jennifer Liu*
Jennifer Liu
Attorneys for Plaintiff
ELAN MICROELECTRONICS CORPORATION