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 11 ELAN MICROELECTRONICS
 CORPORATION

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

17 ELAN MICROELECTRONICS
 18 CORPORATION,

19 Plaintiff,

20 v.

21 APPLE, INC.,

22 Defendant.

23
 24 AND RELATED COUNTERCLAIMS
 25

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

**PLAINTIFF ELAN
 MICROELECTRONICS
 CORPORATION'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 EXHIBITS TO THE DECLARATION
 OF PALANI P. RATHINASAMY IN
 SUPPORT OF PLAINTIFF ELAN
 MICROELECTRONICS
 CORPORATION'S MOTION TO
 COMPEL APPLE TO SUPPLEMENT
 ITS RESPONSE TO ELAN'S
 INTERROGATORY NO. 13**

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 28 PL. ELAN'S ADMIN. MOT. TO FILE UNDER SEAL EXHIBITS
 TO THE DECL. OF PALANI P. RATHINASAMY IN SUPPORT
 OF PL. ELAN'S MOT. TO COMPEL APPLE TO SUPPL. ITS
 RESPONSE TO ELAN'S INTERROG. NO. 13

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. Exhibit B to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 5 2. Exhibit E to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 6 3. Exhibit F to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 7 4. Exhibit G to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 8 5. Exhibit H to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 9 6. Exhibit I to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 10 7. Exhibit J to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 11 8. Exhibit L to the Declaration of Palani P. Rathinasamy (**filed under seal**);
- 12 9. Exhibit M to the Declaration of Palani P. Rathinasamy (**filed under seal**).

13 As grounds for this motion, Elan states that these Exhibits constitute, or disclose
14 information contained in, or derived from, documents designated by the parties as “Confidential –
15 Attorneys’ Eyes Only” pursuant to the Amended Protective Order in this matter. As explained in
16 the Declaration of Palani P. Rathinasamy In Support of Plaintiff Elan Microelectronics
17 Corporation’s Motion To File Under Seal Exhibits to the Declaration of Palani P. Rathinasamy,
18 good cause exists to file these exhibits under seal as the exhibits contain confidential information.
19 These exhibits predominately consist of sealable information such that it may be appropriate to
20 seal the entire document rather than requiring submission of a heavily redacted document that
21 would not substantially further the policy of providing public access to, and understanding of,
22 court proceedings.

23 For the reasons stated above, the Court should grant Elan leave to file the above identified
24 documents entirely under seal.

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DATED: May 24, 2011

Respectfully submitted,
ALSTON & BIRD LLP

By: /s/ Palani P. Rathinasamy
Palani P. Rathinasamy
Attorneys for Plaintiff
ELAN MICROELECTRONICS CORPORATION