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Apple Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS
CORPORATION,

Plaintiff and Counterclaim
Defendant,

v.

APPLE INC.,

Defendant and Counterclaim
Plaintiff.

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

**APPLE INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
APPLE INC.'S MOTION TO COMPEL
AND RELATED PAPERS**

JUDGE: Hon. Paul Singh Grewal

1 Apple Inc. submits this Administrative Motion for a sealing order pursuant to Civil
2 Local Rule 79-5(d), to permit the filing under seal of "Apple Inc.'s Notice of Motion and Motion
3 to Compel (1) Discovery Relating to Elan's U.S. Sales; (2) Documents Improperly Withheld on
4 the Basis of Privilege; and (3) Inventor Depositions" (hereinafter "Apple's Motion to Compel")
5 and related papers. In particular:

6 Apple is lodging with the Court Apple's Motion to Compel and a redacted version
7 of Apple's Motion to Compel. The redacted portions contain information designated by Elan
8 Microelectronics Corp. ("Elan") as confidential pursuant to the protective order in this case.

9 Apple is also lodging with the Court certain exhibits that have been designated by
10 Elan as confidential. Specifically, the following exhibits to the "Declaration of Derek Walter in
11 Support of Apple Inc.'s Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents
12 Improperly Withheld on the Basis of Privilege; and (3) Inventor Depositions" have been
13 designated by Elan as confidential pursuant to the protective order in this case: **Exhibits 2, 4, 8,**
14 **11-14, 16-21, 23, 25-27, 30, and 34-35.**

15 Pursuant to Civil Local Rule 79-5(d), Elan "must file with the Court and serve a
16 declaration establishing that the designated information is sealable, and must lodge and serve a
17 narrowly tailored proposed sealing order, or must withdraw the designation of confidentiality."
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19 Dated: May 31, 2011

WEIL, GOTSHAL & MANGES LLP

21 By: /s/ Nathan Greenblatt
22 Nathan Greenblatt
23 Attorneys for Defendant and
24 Counterclaim Plaintiff Apple Inc.
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