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 Apple Inc.

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

14 ELAN MICROELECTRONICS CORPORATION,
 15
 16 Plaintiff and Counterclaim Defendant,
 17 v.
 18 APPLE INC.,
 19 Defendant and Counterclaim Plaintiff.
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Case No. C-09-01531 RS (PSG)
**APPLE INC.'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
 APPLE INC.'S RESPONSE TO ELAN MICROELECTRONICS CORP.'S
 MOTION TO COMPEL APPLE INC. TO SUPPLEMENT ITS RESPONSE TO
 ELAN'S INTERROGATORY NO. 13**

JUDGE: Hon. Paul Singh Grewal

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1 Apple Inc. submits this Administrative Motion for a sealing order pursuant to Civil
2 Local Rule 79-5. This motion is based on the points and authorities herein, and on the
3 accompanying Declaration of Nathan Greenblatt in Support of Apple Inc.'s Administrative
4 Motion to File Under Seal Apple Inc.'s Response to Elan Microelectronics Corp.'s Motion to
5 Compel Apple Inc. to Supplement Its Response to Elan's Interrogatory No. 13 ("Greenblatt
6 Declaration"). Apple respectfully requests that the Court issue an order permitting the following
7 documents, or portions thereof, to be filed under seal:

8 1. Apple Inc.'s Response to Elan Microelectronics Corp.'s Motion to Compel Apple
9 Inc. to Supplement Its Response to Elan's Interrogatory No. 13 (a partially redacted public version
10 is being lodged with the Court).

11 2. Exhibits 1 and 2 to the Declaration of Derek Walter in Support of Apple Inc.'s
12 Response to Elan Microelectronics Corp.'s Motion to Compel Apple Inc. to Supplement Its
13 Response to Elan's Interrogatory No. 13 (partially redacted public versions are being lodged with
14 the Court).

15 The partially redacted versions of the above documents contain the minimal redactions
16 necessary to protect highly confidential technical information regarding the operation of the
17 accused Apple products, as well as internal codenames for the products. *See* Greenblatt Decl. ¶¶
18 1-3; *see also* Civil L.R. 79-5 (Commentary). Each of the documents listed above has been given
19 particularized consideration, with attention to the Court's policy of providing public access to the
20 court proceedings. *See generally* Greenblatt Decl. Therefore, Apple respectfully requests that the
21 Court grant this motion.

22 Dated: June 7, 2011

WEIL, GOTSHAL & MANGES LLP

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24 By: /s/ Nathan Greenblatt
25 Nathan Greenblatt
26 Attorneys for Defendant and
27 Counterclaim Plaintiff Apple Inc.
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