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 ELAN MICROELECTRONICS
 11 CORPORATION

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 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN FRANCISCO DIVISION
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17 ELAN MICROELECTRONICS
 18 CORPORATION,
 19 Plaintiff and Counterdefendant,
 20 v.
 21 APPLE, INC.,
 22 Defendant and Counterplaintiff.

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

**[PROPOSED] ORDER GRANTING
 DEFENDANT APPLE INC.'S
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL APPLE INC.'S MOTION
 TO COMPEL AND RELATED
 DOCUMENTS**

23
 24 AND RELATED COUNTERCLAIMS
 25

1 The Court has received (1) Defendant Apple Inc.'s Administrative Motion to File Under
2 Seal Apple Inc.'s Motion to Compel and Related Documents, and (2) the Declaration of Jennifer
3 Liu in Support of Apple's Motion to File Under Seal. Good cause appearing, the motion is
4 **GRANTED.**

5 It is hereby ORDERED that the following documents are to be filed under seal as indicated
6 below:

7 1. The redacted portions of Apple Inc.'s Notice of Motion and Motion to Compel (1)
8 Discovery Relating to Elan's U.S. Sales; (2) Documents Improperly Withheld on the Basis of
9 Privilege; and (3) Inventor Depositions.

10 2. Exhibit 2 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
11 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
12 Privilege; and (3) Inventor Depositions.

13 3. Exhibit 4 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
14 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
15 Privilege; and (3) Inventor Depositions.

16 4. The revised Exhibit 8 to the Declaration of Derek Walter in Support of Apple Inc.'s
17 Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on
18 the Basis of Privilege; and (3) Inventor Depositions.

19 5. The revised Exhibit 11 to the Declaration of Derek Walter in Support of Apple
20 Inc.'s Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly
21 Withheld on the Basis of Privilege; and (3) Inventor Depositions.

22 6. Exhibit 12 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
23 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
24 Privilege; and (3) Inventor Depositions.

25 7. Exhibit 13 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
26 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
27 Privilege; and (3) Inventor Depositions.

28 8. Exhibit 14 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to

1 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
2 Privilege; and (3) Inventor Depositions.

3 9. Exhibit 16 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
4 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
5 Privilege; and (3) Inventor Depositions.

6 10. The revised Exhibit 17 to the Declaration of Derek Walter in Support of Apple
7 Inc.'s Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly
8 Withheld on the Basis of Privilege; and (3) Inventor Depositions.

9 11. Exhibit 18 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
10 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
11 Privilege; and (3) Inventor Depositions.

12 12. Exhibit 19 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
13 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
14 Privilege; and (3) Inventor Depositions.

15 13. Exhibit 20 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
16 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
17 Privilege; and (3) Inventor Depositions.

18 14. Exhibit 21 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
19 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
20 Privilege; and (3) Inventor Depositions.

21 15. Exhibit 23 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
22 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
23 Privilege; and (3) Inventor Depositions.

24 16. Exhibit 25 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
25 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
26 Privilege; and (3) Inventor Depositions.

27 17. Exhibit 26 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
28 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of

1 Privilege; and (3) Inventor Depositions.

2 18. The revised Exhibit 27 to the Declaration of Derek Walter in Support of Apple
3 Inc.'s Motion to Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly
4 Withheld on the Basis of Privilege; and (3) Inventor Depositions, including pages 1-5, 14-21 and
5 118.

6 19. Exhibit 34 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
7 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
8 Privilege; and (3) Inventor Depositions.

9 20. Exhibit 35 to the Declaration of Derek Walter in Support of Apple Inc.'s Motion to
10 Compel (1) Discovery Relating to U.S. Sales; (2) Documents Improperly Withheld on the Basis of
11 Privilege; and (3) Inventor Depositions.

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14 IT IS SO ORDERED.

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18 DATED: _____, 2011

UNITED STATES MAGISTRATE JUDGE

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