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 11 ELAN MICROELECTRONICS
 CORPORATION

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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS
 CORPORATION,

 Plaintiff,

 v.

 APPLE, INC.,

 Defendant.

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

**PLAINTIFF ELAN
 MICROELECTRONICS
 CORPORATION'S AMENDED
 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**

AND RELATED COUNTERCLAIMS

PL. ELAN'S AM. 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 and the Court's June 1, 2011 Order Denying
2 Motion to Seal Without Prejudice (Dkt. No. 228), Plaintiff Elan Microelectronics Corporation
3 ("Elan") hereby requests leave of Court to file under seal portions or the entirety of the following
4 documents which have been lodged with the Clerk:

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

12 As grounds for this motion, Elan states that the redacted portions of Exhibits B, E, F, G,
13 and I to the Rathinasamy Declaration disclose confidential information related to Apple's internal
14 code names and the operation of Apple products that was derived from documents or testimony
15 that is designated by Apple, Inc. ("Apple") as "Confidential – Attorneys' Eyes Only" pursuant to
16 the Amended Protective Order in this matter or confidential information related to Elan's products
17 or customer information. *See* Declaration of Palani P. Rathinasamy In Support of Plaintiff Elan
18 Microelectronics Corporation's Renewed Administrative Motion To File Papers Under Seal filed
19 concurrently herewith. In accordance with Civil Local Rule 79-5, for these partially redacted
20 documents, only the minimum and necessary redactions have been made to protect sealable
21 information.

22 Elan states that Exhibits L (Apple circuit schematics) and M (Apple internal e-mail
23 correspondence) contain confidential information regarding the operation of Apple products.
24 These documents have been marked by Apple as "Confidential - Attorneys' Eyes Only". These
25 exhibits predominately consist of sealable information such that it may be appropriate to seal the
26 entire document rather than requiring submission of a heavily redacted document that would not
27 substantially further the policy of providing public access to, and understanding of, court

