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10 Attorneys for Plaintiff and Counterdefendant  
 ELAN MICROELECTRONICS  
 11 CORPORATION

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

ELAN MICROELECTRONICS  
 CORPORATION,  
 Plaintiff and Counterdefendant,  
 v.  
 APPLE, INC.,  
 Defendant and Counterplaintiff.

Case No. 09-cv-01531 RS (PSG)  
**PLAINTIFF ELAN  
 MICROELECTRONICS  
 CORPORATION'S ADMINISTRATIVE  
 MOTION TO FILE UNDER SEAL  
 ELAN'S OPPOSITION TO APPLE,  
 INC.'S MOTION TO COMPEL AND  
 SUPPORTING DOCUMENTS**

AND RELATED COUNTERCLAIMS

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 portions or the entirety of the following  
3 documents which have been lodged with the Clerk:

4 1. Elan Microelectronics Corporation’s Opposition to Apple, Inc.’s (“Apple’s”) Motion  
5 to Compel (**partially sealed**);

6 2. Exhibit 1 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
7 Apple’s Motion to Compel (**filed under seal**);

8 3. Exhibit 5 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
9 Apple’s Motion to Compel (**filed under seal**);

10 4. Exhibit 6 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
11 Apple’s Motion to Compel (**filed under seal**);

12 5. Exhibit 9 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
13 Apple’s Motion to Compel (**partially sealed**);

14 6. Exhibit 10 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
15 Apple’s Motion to Compel (**partially sealed**);

16 7. Exhibit 11 to the Declaration of Jane H. Bu in Support of Elan’s Opposition to  
17 Apple’s Motion to Compel (**partially sealed**).

18 As grounds for this motion, Elan states that the redacted portions of Elan’s Opposition to  
19 Apple’s Motion Compel and Exhibits 9-11 to the Bu Declaration disclose confidential information  
20 relating to Elan employees, Elan’s corporate structure and corporate policy, and sensitive business  
21 information including Elan’s sales and financial information and sales and financial database  
22 systems, that could harm Elan if publicly disclosed. *See* Declaration of Jane H. Bu In Support of  
23 Plaintiff Elan Microelectronics Corporation’s Administrative Motion To File Under Seal Elan’s  
24 Opposition to Apple Inc.’s Motion to Compel and Supporting Documents filed concurrently  
25 herewith. In accordance with Civil Local Rule 79-5, for this partially redacted document, only the  
26 minimum and necessary redactions have been made to protect sealable information.

27 Elan further states that Exhibits 1, 5, 6 to the Bu Declaration contain confidential  
28 information relating to Elan’s corporate policy, sensitive business information including Elan’s

1 sales and financial information and confidential communication between Elan and Apple  
2 regarding Apple's infringement of Elan's patent, that could harm Elan if publicly disclosed.  
3 These exhibits predominately consist of sealable information such that it may be appropriate to  
4 seal the entire document rather than requiring submission of a heavily redacted document that  
5 would not substantially further the policy of providing public access to, and understanding of,  
6 court proceedings.

7 For the reasons stated above, the Court should grant Elan leave to file the above identified  
8 documents either partially or entirely under seal.

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10 DATED: June 14, 2011

10 Respectfully submitted,  
11 ALSTON & BIRD LLP

12 By: \_\_\_\_\_ */s/ Jane H. Bu*

13 Jane H. Bu  
14 Attorneys for Plaintiff  
15 ELAN MICROELECTRONICS CORPORATION  
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