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11	CORPORATION			
12				
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA			
15	SAN FRANCISCO DIVISION			
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17 18	ELAN MICROELECTRONICS CORPORATION,	Case No. 09-cv-01531 RS (PSG)		
19	Plaintiff and Counterdefendant,	PLAINTIFF ELAN MICROELECTRONICS		
20	V.	CORPORATION'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL ITS		
21	APPLE, INC.,	REPLY TO APPLE, INC.'S OPPOSITION TO ELAN'S MOTION		
22	Defendant and Counterplaintiff.	FOR PARTIAL SUMMARY JUDGMENT OF INFRINGEMENT AND SUPPORTING DOCUMENTS		
23		_ SUPPORTING DOCUMENTS		
24	AND RELATED COUNTERCLAIMS			
25				
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	ELAN'S ADMIN. MOT. TO FILE UNDER SEAL ITS REPLY TO APPLE'S OPP'N TO ELAN'S MOT. FOR PARTIAL SUMM. J. OF INFRINGEMENT AND SUPPORTING DOCUMENTS	1 Case No. 09-cv-01531 RS (PSG)		

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiff Elan Microelectronics Corporation 1 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: 1. 4 Elan's Reply to Apple Inc.'s ("Apple's") Opposition to Elan's Motion for Partial 5 Summary Judgment of Infringement of U.S. Patent 5,825,352 ("the 352 patent") (partially sealed); 2. Declaration of Robert Dezmelyk in Support of Elan's Reply to Apple's Opposition 6 7 to Elan's Motion for Partial Summary Judgment of Infringement (partially sealed); 8 3. Exhibit I to the Declaration of Jennifer Liu in Support of Elan's Reply to Apple's 9 Opposition to Elan's Motion for Partial Summary Judgment of Infringement (filed under seal); 4. 10 Exhibit J to the Declaration of Jennifer Liu in Support of Elan's Reply to Apple's 11 Opposition to Elan's Motion for Partial Summary Judgment of Infringement (filed under seal); 5. 12 Exhibit K to the Declaration of Jennifer Liu in Support of Elan's Reply to Apple's 13 Opposition to Elan's Motion for Partial Summary Judgment of Infringement (filed under seal); 14 6. Exhibit L to the Declaration of Jennifer Liu in Support of Elan's Reply to Apple's 15 Opposition to Elan's Motion for Partial Summary Judgment of Infringement (filed under seal); 7. Exhibit M to the Declaration of Jennifer Liu in Support of Elan's Reply to Apple's 16 17 Opposition to Elan's Motion for Partial Summary Judgment of Infringement (filed under seal). 18 As grounds for this motion, Elan states that the redacted portions of Elan's Reply and the 19 Dezmelyk Declaration in Support of Elan's Reply disclose information derived from documents that Apple has marked as "Confidential - Attorney Eyes Only" or "Confidential - Attorneys' Eyes 2021 Only - Source Code" pursuant to the Amended Protective Order in this matter and confidential 22 communications between Elan and Apple regarding Apple's infringement of the 352 patent. See 23 Declaration of Jennifer Liu in Support of Plaintiff Elan Microelectronics Corporation's 24 Administrative Motion to File Under Seal filed concurrently herewith. In accordance with Civil 25 Local Rule 79-5, for these partially redacted documents, only minimum and necessary redactions 26 are made to protect sealable information. 27 Elan further states that Exhibits I-M to the Liu Declaration in Support of Elan's Reply 28 constitute documents designated by Apple as "Confidential - Attorney Eyes Only" pursuant to the ELAN'S ADMIN. MOT. TO FILE UNDER SEAL ITS REPLY TO APPLE'S OPP'N TO ELAN'S MOT. FOR PARTIAL SUMM. J. OF 2 INFRINGEMENT AND SUPPORTING DOCUMENTS

1	Amended Protective Order in this matter and contain confidential communications between Elan		
2	and Apple regarding Apple's infringement of the 352 patent. See id. These exhibits		
3	predominately consist of sealable information such that it may be appropriate to seal the entire		
4	document rather than requiring submission of a heavily redacted document that would not		
5	substantially further the policy of providing public access to, and understanding of, court		
6	proceedings.		
7	Pursuant to Civil Local Rule 79-5, Apple must file with the Court and serve a declaration		
8	establishing that its designated information is sealable, and must lodge and serve a narrowly		
9	tailored proposed sealing order, or must withdraw the designation of confidentiality.		
10	For the reasons stated above, the Court should grant Elan leave to file the above identified		
11	documents either partially or entirely under seal.		
12	DATED: June 16, 2011	Respectfully submitted,	
13		ALSTON & BIRD LLP	
14			
15		By: /Jennifer Liu/	
16		Jennifer Liu Attorneys for Plaintiff	ODATION
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28	ELAN'S ADMIN. MOT. TO FILE UNDER SEA APPLE'S OPP'N TO ELAN'S MOT. FOR PART INFRINGEMENT AND SUPPORTING DOCUM	FIAL SUMM. J. OF 2	Case No. 09-cv-01531 RS (PSG)