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 APPLE INC.

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

14 ELAN MICROELECTRONICS
 15 CORPORATION,
 16 Plaintiff and Counterclaim
 Defendant,

17 v.

18 APPLE INC.,
 19 Defendant and Counterclaim
 20 Plaintiff.

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

**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 APPLE INC.'S REPLY IN SUPPORT
 OF MOTION TO COMPEL**

Date: July 5, 2011
 Time: 10:00 am

Hon. Paul Singh Grewal

1 Apple Inc. submits this Administrative Motion for a sealing order pursuant to Civil
2 Local Rule 79-5(d), to permit the filing under seal of “Apple Inc.’s Reply Brief in Support of Its
3 Motion to Compel (1) Discovery Relating to Elan’s U.S. Sales, (2) Documents Improperly
4 Withheld On The Basis Of Privilege And (3) Inventor Depositions” (hereinafter “Apple’s Reply
5 In Support of Motion to Compel”) and related paper. In particular:

6 Apple is lodging with the Court Apple’s Reply in Support of Motion to Compel
7 and a redacted version of Apple’s Reply in Support of Motion to Compel. The redacted portions
8 contain information designated by Elan Microelectronics Corp. (“Elan”) as confidential pursuant
9 to the protective order in this case.

10 Apple is also lodging with the Court certain exhibits that have been designated by
11 Elan as confidential. Specifically, the following exhibits to the Declaration of Derek C. Walter in
12 Support of Apple’s Reply Brief in Support of Its Motion to Compel (1) Discovery Relating to
13 Elan’s U.S. Sales; (2) Documents Improperly Withheld On The Basis Of Privilege; And (3)
14 Inventor Depositions” have been designated by Elan as confidential pursuant to the protective
15 order in this case: **Exhibit B.**

16 Pursuant to Civil Local Rule 79-5(d), Elan “must file with the Court and serve a
17 declaration establishing that the designated information is sealable, and must lodge and serve a
18 narrowly tailored proposed sealing order, or must withdraw the designation of confidentiality.”

19 Dated: June 21, 2011

WEIL, GOTSHAL & MANGES LLP

21 By: /s/ Derek C. Walter
22 Derek C. Walter

23 Attorneys for Defendant and Counterclaim
24 Plaintiff APPLE INC.