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 ELAN MICROELECTRONICS  
 11 CORPORATION

12  
 13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION  
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17 ELAN MICROELECTRONICS  
 18 CORPORATION,

19 Plaintiff and Counterdefendant,

20 v.

21 APPLE, INC.,

22 Defendant and Counterplaintiff.

23  
 24 AND RELATED COUNTERCLAIMS  
 25  
 26  
 27  
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Case No. 09-cv-01531 RS (PSG)

**PLAINTIFF ELAN  
 MICROELECTRONICS  
 CORPORATION'S ADMINISTRATIVE  
 MOTION TO FILE UNDER SEAL  
 EXHIBITS D-G OF THE  
 DECLARATION OF PALANI P.  
 RATHINASAMY IN SUPPORT OF  
 ELAN MICROELECTRONICS  
 CORPORATION'S UNOPPOSED  
 MOTION TO AMEND INFRINGEMENT  
 CONTENTIONS PURSUANT TO PAT.  
 L.R. 3-6**

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. Exhibit D to the Declaration of Palani P. Rathinasamy (**filed under seal**).
- 5 2. Exhibit E to the Declaration of Palani P. Rathinasamy (**filed under seal**).
- 6 3. Exhibit F to the Declaration of Palani P. Rathinasamy (**filed under seal**).
- 7 4. Exhibit G to the Declaration of Palani P. Rathinasamy (**filed under seal**).

8 Exhibits D-G to the Rathinasamy Declaration constitutes claim charts showing  
9 infringement of the Accused Apple Products. The claim charts were derived from information  
10 that Apple has designated as “Confidential – Attorney Eyes Only” pursuant to the Amended  
11 Protective Order in this matter and discusses the internal operation of Apple’s products. *See*  
12 Declaration of Palani P. Rathinasamy in Support of Plaintiff Elan Microelectronics Corporation’s  
13 Administrative Motion to File Under Seal filed concurrently herewith. Exhibits D-G were sent to  
14 Apple’s counsel prior to filing this motion and Apple’s counsel requested that they be filed under  
15 seal. These exhibits predominately consists of sealable information such that it may be  
16 appropriate to seal the entire document rather than requiring submission of a heavily redacted  
17 document that would not substantially further the policy of providing public access to, and  
18 understanding of, court proceedings.

19 Pursuant to Civil Local Rule 79-5, Apple must file with the Court and serve a declaration  
20 establishing that its designated information is sealable, and must lodge and serve a narrowly  
21 tailored proposed sealing order, or must withdraw the designation of confidentiality.

22 For the reasons stated above, the Court should grant Elan leave to file the above identified  
23 documents entirely under seal.

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DATED: July 22, 2011

Respectfully submitted,  
  
ALSTON & BIRD LLP

By: Palani P. Rathinasamy/  
Palani P. Rathinasamy  
Attorneys for Plaintiff  
ELAN MICROELECTRONICS CORPORATION

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