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12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION  
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17 ELAN MICROELECTRONICS  
18 CORPORATION,  
19 Plaintiff and Counterdefendant,  
20 v.  
21 APPLE, INC.,  
22 Defendant and Counterplaintiff.

Case No. 5:09-cv-01531 RS (PSG)

**PLAINTIFF ELAN  
MICROELECTRONICS  
CORPORATION'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF PAPERS IN SUPPORT  
OF ITS MOTION TO COMPEL  
DISCOVERY ON VARIOUS ISSUES**

23  
24 AND RELATED COUNTERCLAIMS  
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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 of the following documents  
3 which have been lodged with the Clerk:

4 1. Exhibit G to the Declaration of Jane H. Bu in Support of Elan’s Motion to Compel  
5 Discovery on Various Issues (**partially redacted**);

6 2. Exhibit H to the Declaration of Jane H. Bu in Support of Elan’s Motion to Compel  
7 Discovery on Various Issues (**partially redacted**).

8 As grounds for this motion, Elan states that portions of Exhibits G and H to the Bu  
9 Declaration are designated by Apple, Inc. (“Apple”) as “Confidential – Attorney Eyes Only”  
10 pursuant to the Amended Protective Order in this matter. In accordance with Civil Local Rule 79-  
11 5, for these partially redacted documents, only the minimum and necessary redactions have been  
12 made to protect sealable information.

13 Pursuant to Civil Local Rule 79-5(d), Apple must file with the Court and serve a  
14 declaration establishing that the designated information is sealable, and must lodge and serve a  
15 narrowly tailored proposed sealing order, or must withdraw the designation of confidentiality.

16 DATED: July 26, 2011

17 Respectfully submitted,  
18 ALSTON & BIRD LLP

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20 By: \_\_\_\_\_ /s/ Jennifer Liu  
21 Jennifer Liu  
22 Attorneys for Plaintiff  
23 ELAN MICROELECTRONICS CORPORATION  
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