

1 MATTHEW D. POWERS (Bar No. 104795)
 matthew.powers@tensegritylawgroup.com
 2 TENSEGRITY LAW GROUP LLP
 201 Redwood Shores Parkway, Suite 401
 3 Redwood Shores, CA 94065
 Telephone: (650) 802-6000
 4 Facsimile: (650) 802-6001

5 JARED BOBROW (Bar No. 133712)
 jared.bobrow@weil.com
 6 SONAL N. MEHTA (Bar No. 222086)
 sonal.mehta@weil.com
 7 DEREK C. WALTER (Bar. No. 246322)
 derek.walter@weil.com
 8 NATHAN GREENBLATT (Bar No. 262279)
 nathan.greenblatt@weil.com
 9 WEIL, GOTSHAL & MANGES LLP
 Silicon Valley Office
 10 201 Redwood Shores Parkway
 Redwood Shores, CA 94065
 11 Telephone: (650) 802-3000
 Facsimile: (650) 802-3100

12 Attorneys for Defendant and Counterclaim Plaintiff
 13 Apple Inc.

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA
 16 SAN FRANCISCO DIVISION

17 ELAN MICROELECTRONICS
 CORPORATION,
 18
 Plaintiff and Counterclaim
 19 Defendant,
 20 v.
 21 APPLE INC.,
 22 Defendant and Counterclaim
 Plaintiff.
 23

Case No. C-09-01531 RS (PSG)
**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL
 APPLE INC.'S OPPOSITION TO
 ELAN MICROELECTRONICS
 CORPORATION'S MOTION TO
 COMPEL DISCOVERY ON VARIOUS
 ISSUES**

JUDGE: Hon. Paul S. Grewal

1 Apple Inc. submits this Administrative Motion for a sealing order pursuant to Civil Local
2 Rule 79-5. This motion is based on the points and authorities herein, and on the accompanying
3 Declaration of Nathan Greenblatt in Support of Apple Inc.'s Administrative Motion to File Under
4 Seal Apple Inc.'s Opposition to Elan Microelectronics Corporation's Motion to Compel
5 Discovery on Various Issues ("Greenblatt Decl."). Apple respectfully requests that the Court
6 permit the following:

7 1. Apple Inc.'s Opposition to Elan Microelectronics Corporation's Motion to Compel
8 Discovery on Various Issues ("Apple's Motion") may be filed under seal. A partially redacted
9 public version may be filed in the public docket.

10 2. **Exhibits 8 and 10** to the Declaration of Nathan Greenblatt in Support of Apple's
11 Motion may be filed under seal.

12 3. **Exhibit 9** to the Declaration of Nathan Greenblatt in Support of Apple's Motion
13 may be filed under seal. A partially redacted public version may be filed in the public docket.

14 As grounds for the motion, Apple states that the documents or portions of documents for
15 which sealing is requested contain highly confidential technical information and codenames for
16 Apple products and testing tools, which could harm Apple if publicly disclosed. *See* Greenblatt
17 Decl. ¶¶ 1-3. The documents listed above have been given particularized consideration, with
18 attention to the Court's policy of providing public access to the court proceedings. *See id.*
19 Therefore, Apple respectfully requests that the Court grant this motion.

20
21 Dated: August 9, 2011

WEIL, GOTSHAL & MANGES LLP

22
23 By: /s/ Nathan Greenblatt
24 Nathan Greenblatt
25 Attorneys for Defendant and
26 Counterclaim Plaintiff Apple Inc.
27
28