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11 ELAN MICROELECTRONICS
CORPORATION

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION
16

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
PAPERS IN SUPPORT OF ITS REPLY
TO MOTION TO COMPEL
DISCOVERY RELATED TO APPLE iOS
APPLICATIONS FOR THE ACCUSED
PRODUCTS**

23
24 AND RELATED COUNTERCLAIMS
25
26
27
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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 the following documents which have
3 been lodged with the Clerk:

4 Exhibits 1-3 to the Declaration of Jane H. Bu in Support of Elan’s Reply to Motion to
5 Compel Discovery Related to Apple iOS Applications for the Accused Products (**filed under seal**).

6 As grounds for this motion, Elan states that Exhibits 1-3 to the Bu Declaration are
7 designated by Apple, Inc. (“Apple”) as “Confidential” pursuant to the Amended Protective Order
8 in this matter.

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

12 DATED: August 9, 2011

Respectfully submitted,

ALSTON & BIRD LLP

13 By: _____ /s/ Jennifer Liu

14 Jennifer Liu

15 Attorneys for Plaintiff

16 ELAN MICROELECTRONICS CORPORATION