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11 ELAN MICROELECTRONICS  
CORPORATION

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  
PAPERS IN SUPPORT OF ITS REPLY  
IN SUPPORT OF 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 the following documents which have  
3 been lodged with the Clerk:

4 1. Exhibit 1 to the Declaration of Jane H. Bu in Support of Elan’s Reply in Support of  
5 Motion to Compel Discovery on Various Issues (**filed under seal**).

6 2. Exhibit 3 to the Declaration of Jane H. Bu in Support of Elan’s Reply in Support of  
7 Motion to Compel Discovery on Various Issues (**partially redacted**).

8 As grounds for this motion, Elan states that Exhibit 1 to the Bu Declaration is designated  
9 by Apple, Inc. (“Apple”) as “Confidential – Attorney Eyes Only” pursuant to the Amended  
10 Protective Order in this matter. In addition, Exhibit 3 to the Bu Declaration contains information  
11 designated by Apple as “Confidential – Attorney Eyes Only” pursuant to the Amended Protective  
12 Order in this matter.

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: August 16, 2011

17 Respectfully submitted,

18 ALSTON & BIRD LLP

19 By: \_\_\_\_\_ /s/ Jennifer Liu

20 Jennifer Liu

21 Attorneys for Plaintiff

22 ELAN MICROELECTRONICS CORPORATION  
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