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 11 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

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

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 17 APPLE INC., a California corporation,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 22 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 23 Defendants.
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Case No. 11-cv-01846-LHK
**APPLE'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL RE APPLE'S
 OPPOSITION TO SAMSUNG'S
 MOTION FOR SUMMARY
 JUDGMENT**

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62, Apple Inc.
2 (“Apple”) submits this motion for an order to seal the following documents or portions thereof:

3 1. Exhibits A and B to the Declaration of Janusz A. Ordover, Ph.D. in Support of
4 Apple’s Opposition to Samsung’s Motion for Summary Judgment (“Ordover Declaration”); and

5 2. Exhibits A and B to the Declaration of Mark D. Selwyn in Support of Apple’s
6 Opposition to Samsung’s Motion for Summary Judgment (“Selwyn Declaration”).

7 Exhibit A to the Ordover Declaration and Exhibits A and B to the Selwyn Declaration
8 contain information that is highly confidential as set out in the Declaration of Cyndi Wheeler in
9 Support of Apple’s Administrative Motion to File Documents Under Seal (“Wheeler
10 Declaration”) (Dkt. No. 998). It is Apple’s policy not to disclose or describe to third parties its
11 confidential financial, design, trade secrets, or product development information. (Wheeler
12 Declaration ¶ 11.) The Apple-confidential material in these exhibits relate to such confidential
13 information, as detailed in the Wheeler Declaration. (*Id.* ¶ 1-10.) This information is highly
14 confidential to Apple and could be used by Apple’s competitors to Apple’s disadvantage if
15 disclosed publicly. (*Id.*) The relief requested in this motion is necessary and is narrowly tailored
16 to protect confidential information specific exhibits to the declarations at issue. (*Id.* ¶ 14.)

17 Exhibits A and B to the Ordover Declaration contain materials that Samsung has
18 designated as confidential under the protective order entered in this case. Apple expects that,
19 pursuant to Civil Local Rule 79-5(d), Samsung will file a declaration seeking to establish good
20 cause to permit the sealing of these materials.

21 Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at
22 issue.

23 Dated: May 31, 2012

MORRISON & FOERSTER LLP

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25 By: /s/ Michael A. Jacobs
MICHAEL A. JACOBS

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27 Attorneys for Plaintiff
APPLE INC.