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Attorneys for Plaintiff and
 Counterclaim-Defendant Apple Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

13 APPLE INC., a California corporation,
 14 Plaintiff,
 15 vs.
 16 SAMSUNG ELECTRONICS CO., LTD., a
 17 Korean business entity, SAMSUNG
 18 ELECTRONICS AMERICA, INC., a New
 19 York corporation, and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 20 LLC, a Delaware limited liability company,
 Defendants.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

21 SAMSUNG ELECTRONICS CO., LTD., a
 22 Korean business entity, SAMSUNG
 23 ELECTRONICS AMERICA, INC., a New
 24 York corporation, and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 25 LLC, a Delaware limited liability company,
 Counterclaim-Plaintiffs,
 26 v.
 27 APPLE INC., a California corporation,
 Counterclaim-Defendant.
 28

1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple Inc.
2 (“Apple”) moves for an order to seal the following documents:

- 3 1. Confidential portions of Apple’s Opposition to Samsung’s Motion to Enforce the
4 Court’s April 12, 2012 Order, filed herewith.
- 5 2. Exhibits 1, 2 and 7 to the Declaration of Mia Mazza in Support of Apple’s
6 Opposition to Samsung’s Motion to Enforce the Court’s April 12, 2012 Order, filed
7 herewith.

8 Item 1 of the above documents contains information that Samsung has designated as
9 confidential under the protective order. Apple expects that pursuant to Civil Local Rule 79-5(d),
10 Samsung will file a declaration, and accompanying Proposed Order, attempting to establish good
11 cause to permit the sealing of these materials.

12 Item 2 of the above documents contains information that is Apple-confidential as set out
13 in the Declaration of Erica Tierney in Support of Apple’s Administrative Motion to File
14 Documents Under Seal (“Tierney Declaration”), filed herewith. As described in the Tierney
15 Declaration, this motion requests relief that is necessary and narrowly tailored to protect only
16 that confidential information. It is Apple’s policy not to disclose or describe its confidential
17 design and product development and/or procurement information. (Tierney Declaration ¶ 3.)
18 This information is highly confidential to Apple. (*Id.*) The information described above could
19 be used by Apple’s competitors to Apple’s disadvantage if disclosed publicly. (*Id.*) The relief
20 requested in this motion is necessary and is narrowly tailored to protect confidential information,
21 focusing only on specific portions of the documents at issue. (*Id.* ¶ 4.)

22 Pursuant to the Court’s standing order regarding motions to file under seal, effective
23 December 1, 2011, attached is the proposed public redacted versions of Items 1 and 2 that Apple
24 is seeking to file under seal. Pursuant to Civil L.R. 79-(c), Apple will lodge with the Clerk the
25 documents at issue with the sealable portions highlighted.

26 Pursuant to General Order No. 62, Apple’s entire filing will be lodged with the Court for
27 *in camera* review and served on all parties.

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1 Dated: June 5, 2012

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