

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 425 Market Street
 8 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE
 william.lee@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 60 State Street
 Boston, MA 02109
 Telephone: (617) 526-6000
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)
 mark.selwyn@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 950 Page Mill Road
 Palo Alto, California 94304
 Telephone: (650) 858-6000
 Facsimile: (650) 858-6100

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 11 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

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

16 APPLE INC., a California corporation,
 17 Plaintiff,
 18 v.
 19 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 20 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 21 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 22 Defendants.
 23

Case No. 11-cv-01846-LHK (PSG)

**ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL DOCUMENTS
 REGARDING APPLE'S
 ADMINISTRATIVE MOTION FOR
 LEAVE TO FILE OBJECTION TO
 REPLY EVIDENCE**

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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. The confidential, unredacted Supplemental Declaration of Ravin Balakrishnan,
4 Ph.D. in Support of Apple’s Opposition to Samsung’s Motion for Summary
5 Judgment (“Supplemental Balakrishnan Declaration”) (Exhibit B to Apple’s
6 Administrative Motion for Leave to File Objection to Reply Evidence), which has
7 been designated confidential as set forth below.

8 The Supplemental Balakrishnan Declaration contains information that Samsung has
9 represented was designated “under the protective order” by third party MERL, and which
10 Samsung designated “Highly Confidential – Attorneys’ Eyes Only” until it could confer with
11 third Party MERL about the appropriate designation. Apple expects that, pursuant to Civil Local
12 Rule 79-5(d), either Samsung or third party MERL will file a declaration seeking to establish
13 good cause to permit the sealing of these materials. A copy of this motion will concurrently be
14 sent to third party MERL.

15 Pursuant to Civil Local Rule 79-5(c), Apple will lodge with the Clerk the documents at
16 issue.

17 Dated: June 22, 2012

MORRISON & FOERSTER LLP

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

21 Attorneys for Plaintiff
APPLE INC.