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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.

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

**ADMINISTRATIVE MOTION TO  
 FILE UNDER SEAL DOCUMENTS  
 REGARDING APPLE'S  
 OPPOSITION TO SAMSUNG'S  
 MOTION TO STAY AND SUSPEND  
 THE JUNE 26, 2012 PRELIMINARY  
 INJUNCTION PENDING APPEAL  
 OR, ALTERNATIVELY, PENDING  
 DECISION BY FEDERAL CIRCUIT  
 ON STAY PENDING APPEAL**

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, unreacted Opposition to Samsung’s Motion to Stay and Suspend  
4 the June 26, 2012 Preliminary Injunction Pending Appeal or, Alternatively,  
5 Pending Decision by Federal Circuit on Stay Pending Appeal (“Opposition”);
- 6 2. Exhibits A to the Declaration of Jason R. Bartlett In Support of Apple’s  
7 Opposition to Samsung’s Motion to Stay and Suspend the June 26, 2012  
8 Preliminary Injunction Pending Appeal or, Alternatively, Pending Decision by  
9 Federal Circuit on Stay Pending Appeal (“Bartlett Declaration”) which has been  
10 designated confidential as set forth below.

11 The Opposition and Exhibit A to the Bartlett Declaration contain materials that Samsung  
12 has designated as confidential under the protective order entered in this case. Apple expects that,  
13 pursuant to Civil Local Rule 79-5(d), Samsung will file a declaration seeking to establish good  
14 cause to permit the sealing of these materials.

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

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18 Dated: June 29, 2012<sup>1</sup>

MORRISON & FOERSTER LLP

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20 By:  /s/ Michael A. Jacobs  
Michael A. Jacobs

21 Attorneys for Plaintiff  
22 APPLE INC.

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 <sup>1</sup> Reflects date of filing via email as instructed by the Court due to ECF outage.