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 9 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

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 11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

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

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

**ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL DOCUMENTS
 REGARDING APPLE'S OPENING
 SUPPLEMENTAL CLAIM
 CONSTRUCTION BRIEF**

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 version of Apple’s Opening Supplemental Claim
4 Construction Brief;
- 5 2. The confidential, unredacted Declaration of Ravin Balakrishnan, Ph.D. in Support
6 of Apple’s Opening Supplemental Claim Construction Brief; and
- 7 3. Exhibit 6 to the Declaration of Deok Keun Matthew Ahn in Support of Apple’s
8 Opening Supplemental Claim Construction Brief, which have been designated
9 confidential as set forth below.

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

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

19 Dated: July 5, 2012

MORRISON & FOERSTER LLP

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

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23 Attorneys for Plaintiff
APPLE INC.