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11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC

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

17 APPLE INC., a California corporation,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 22 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company,
 23 Defendants.
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Case No. 11-cv-01846-LHK

**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL RE: APPLE'S TRIAL
 BRIEF**

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1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Apple Inc. (“Apple”) submits this motion for an order to seal the confidential, unredacted version
3 of Apple’s Trial Brief.

4 Apple submits this motion only because we are required to do so by this Court’s
5 protective order. Apple’s Trial Brief contains information that Samsung has designated as highly
6 confidential. Apple conferred with Samsung today in an attempt to avoid this motion, and
7 provided Samsung with details of the information in our brief. Samsung refused to relieve us of
8 the duty of filing this motion. In light of the Court’s clear statement that only compelling reasons
9 will now permit the sealing of materials in this case, Samsung’s decision seems nothing more
10 than a bad faith attempt to delay public review of the evidence in this case. Apple infers Samsung
11 intends to file a declaration seeking to establish that “compelling reasons” permit the sealing of
12 these materials. *See* Civ. Local R. 79-5(d).

13 Pursuant to Civil Local Rule 79-5(c), Apple will lodge with the Clerk the brief with the
14 sealable portions highlighted.

15
16 Dated: July 23, 2012

MORRISON & FOERSTER LLP

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18 By: /s/ Alison M. Tucher
19 ALISON M. TUCHER

20 Attorney for Plaintiff
21 APPLE INC.

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ATTESTATION OF E-FILED SIGNATURE

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Alison Tucher has concurred in this filing.

Dated: July 23, 2012

/s/ Michael A. Jacobs
Michael A. Jacobs