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17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA
 19 SAN JOSE DIVISION

20 APPLE INC.,

21 Plaintiff,

22 v.

23 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 24 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 25 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,

26 Defendants.

Case No.: C-11-01846 (LHK)

**NOTICE AND MOTION TO SEAL
 DOCUMENTS IN SUPPORT OF
 OPPOSITION TO DEFENDANTS'
 MOTION TO DISQUALIFY BRIDGES
 & MAVRAKAKIS, LLP**

Date: August 24, 2011
 Time: 2:00 p.m.
 Place: Courtroom 8, 4th Floor

Honorable Lucy H. Koh

1 Pursuant to Federal Rule of Civil Procedure 5.2(e) and Civil Local Rules 7-11 and 79-5,
2 Apple Inc. respectfully moves for leave to file portions of three selected declarations filed in
3 support of the Plaintiff's Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis
4 LLP under seal.

5 1. The confidential version of the Declaration of Kenneth H. Bridges in Support of the
6 Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition")
7 contains confidential, non-public information regarding a settlement meeting that occurred
8 between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a
9 copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties,
10 and will be e-filed with the Court pending the Court's granting of this Motion to Seal. The
11 following portions of the Declaration of Kenneth H. Bridges have been properly filed under seal
12 because they contain confidential information: Page 2, lines 18-27.

13 3. The confidential version of the Declaration of Thomas C. Mavrakakis in Support of
14 the Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition")
15 contains confidential, non-public information regarding a settlement meeting that occurred
16 between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a
17 copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties,
18 and will be e-filed with the Court pending the Court's granting of this Motion to Seal. The
19 following portion of the Declaration of Thomas C. Mavrakakis have been properly filed under seal
20 because they contain confidential information: Page 1, lines 20-26.

21 5. The confidential version of the Declaration of Michael T. Pieja in Support of the
22 Opposition to Defendants' Motion to Disqualify Bridges & Mavrakakis LLP ("Opposition")
23 contains confidential, non-public information regarding a settlement meeting that occurred
24 between Apple and Samsung in or about September 2010. Pursuant to General Order No. 62, a
25 copy of the Declaration has been lodged with the Court for *in camera* review, served on all parties,
26 and will be e-filed with the Court pending the Court's granting of this Motion to Seal. The
27 following portions of the Declaration of Michael T. Pieja have been properly filed under seal
28 because they contain confidential information: Page 1, lines 19-28; and page 2, lines 1-2.

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This request is narrowly tailored to seal only the material for which good cause to seal has been established. For the foregoing reasons, Apple Inc. and Bridges respectfully request that the Court grant their Administrative Motion to Seal Portions of the supporting declarations of Kenneth H. Bridges, Thomas C. Mavrakakis, and Michael T. Pieja. Apple and Bridges have lodged and served a Proposed Order herewith, accompanied by the supporting Declaration of Joshua R. Benson.

Dated: August 1, 2011

Respectfully submitted,

TAYLOR & COMPANY LAW OFFICES, LLP

By: /s/ Joshua R. Benson
 Joshua R. Benson
Attorneys for Plaintiff APPLE INC.