

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 RACHEL KREVANS (CA SBN 116421)
 rkrevans@mofo.com
 4 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 5 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 6 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 7 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 8 MORRISON & FOERSTER LLP
 425 Market Street
 9 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 10 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

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.
 24

Case No. 11-cv-01846-LHK

**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL RE: APPLE'S RESPONSE
 TO SAMSUNG'S MOTION FOR
 RECONSIDERATION REGARDING
 SLIDES 11-19**

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

- 4 • The Declaration of Jason R. Bartlett in Support of Apple’s Response to Samsung’s
5 Motion for Reconsideration Regarding Slides 11-19 (“Bartlett Decl.”);
- 6 • Exhibits 1-3 to the Bartlett Decl.

7 Apple submits this motion only because we are required to do so by this Court’s
8 protective order. The Bartlett Decl. and Exhibit 1-3 thereto contain information that Samsung has
9 designated as highly confidential. Apple conferred with Samsung today in an attempt to avoid
10 this motion, and provided Samsung with details of the information in our submission. Samsung
11 refused to relieve us of the duty of filing this motion. In light of the Court’s clear statement that
12 only compelling reasons will now permit the sealing of materials in this case, Samsung’s decision
13 seems nothing more than a bad faith attempt to delay public review of the evidence in this case.
14 Apple infers Samsung intends to file a declaration seeking to establish that “compelling reasons”
15 permit the sealing of these materials. *See* Civ. Local R. 79-5(d).

16 Pursuant to Civil Local Rule 79-5(c), Apple will lodge with the Clerk the Bartlett Decl.
17 and Exhibits 1-3.

18
19 Dated: July 30, 2012

MORRISON & FOERSTER LLP

20
21 By: /s/ Jason R. Bartlett
22 Jason R. Bartlett

23 Attorney for Plaintiff
24 APPLE INC.