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 QUALCOMM INCORPORATED

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

14 APPLE INC., a California corporation,,
 15

16 Plaintiffs,

17 vs.

18 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 ELECTRONICS AMERICA, INC., a New
 19 York corporation; and SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC,
 20 a Delaware limited liability company,

21 Defendants.

Case No. 11-CV-01846-LHK

**NON-PARTY QUALCOMM
 INCORPORATED'S MOTION FOR
 LEAVE TO FILE REPLY TO
 REUTERS AMERICA LLC'S
 OPPOSITION TO MOTIONS TO
 SEAL TRIAL AND PRETRIAL
 EVIDENCE**

23 Non-Party Qualcomm Incorporated respectfully requests leave to file a reply to
 24 address the erroneous argument in Reuters America LLC's Opposition to Motions to Seal
 25 Trial and Pretrial Evidence that Qualcomm's administrative motion to seal is moot. As set
 26 forth in Qualcomm's reply, attached as Exhibit A to the declaration of David A. Kays
 27 filed herewith, despite the inadvertent disclosure of the licensing terms that were the
 28 subject of Qualcomm's administrative motion to seal – which Qualcomm has addressed –

1 sealing Qualcomm's confidential information in this Court's record still matters in the real
2 world.

3 In light of this erroneous argument directed at Qualcomm's administrative motion to
4 seal, Qualcomm respectfully requests leave to file a short reply to address this argument, a
5 copy of which is attached as Exhibit A to the declaration of David A. Kays filed
6 concurrently herewith.

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Dated: August 3, 2012

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By: /S/
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