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 12 MOTOROLA MOBILITY LLC

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

16 APPLE, INC., a California Corporation,)
 17)
 Plaintiff,)
 18)
 v.)
 19)
 20 SAMSUNG ELECTRONICS CO., LTD., a)
 Korean corporation; SAMSUNG)
 21 ELECTRONICS AMERICA, INC., a New York)
 corporation; SAMSUNG)
 22 TELECOMMUNICATIONS AMERICA, LLC, a)
 Delaware limited liability company,)
 23)
 Defendants.)
 24)
 25)

CASE NO.: 11-CV-01846-LHK

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

Date: Expedited Request
 Courtroom: 8, 4th Floor
 Judge: Hon. Lucy H. Koh

1 Non-Party Motorola Mobility LLC respectfully requests leave to file a reply to address
2 Reuters America LLC's Opposition to Motions to Seal Trial and Pretrial Evidence. As set forth
3 in Motorola's reply, attached as Exhibit A to the declaration of Jennifer A. Golinveaux filed
4 herewith, Reuter's fails to rebut the particularized document-by-document showing of the harm
5 that would result from disclosure of the Motorola confidential information that was the subject of
6 Motorola's motion. Instead of refuting the facts and specific concerns of the non-parties at hand,
7 Reuters relies on a joint declaration of five college professors who do not even purport to know
8 the facts of the situation (Dkt. No. 1556-4). Even Reuters' declarants "recognize and respect the
9 value of confidentiality with respect to licensing data."

10 In light of Reuter's inadequate argument directed at Motorola's administrative motion to
11 seal, Motorola respectfully requests leave to file a short reply to address this argument.

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13 Dated: August 6, 2012

WINSTON & STRAWN LLP

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By: /s/ Jennifer A. Golinveaux
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