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 6 *LM Ericsson*

7
 8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN JOSE DIVISION

11 APPLE, INC., a California Corporation,)

Case No. 5:11-CV-01846-LHK

12 Plaintiff,)

13 vs.)

14 SAMSUNG ELECTRONICS CO., LTD.,)
 a Korean corporation; SAMSUNG)
 15 ELECTRONICS AMERICA, INC., a)
 New York corporation; SAMSUNG)
 16 TELECOMMUNICATIONS AMERICA,)
 LLC, a Delaware limited liability)
 17 company,)

**NON-PARTY TELEFONAKTIEBOLAGET
 LM ERICSSON'S MOTION FOR LEAVE TO
 FILE REPLY TO THIRD- PARTY
 INTERVENOR REUTERS AMERICA LLC'S
 OPPOSITION TO MOTION TO SEAL
 TRIAL AND PRETRIAL EVIDENCE**

18 Defendants.)

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1 Non-Party Telefonaktiebolaget LM Ericsson (“Ericsson”) respectfully requests leave to reply
2 to Third-Party Intervenor Reuters America LLC’s (“Reuters”) Opposition to Motion to Seal Trial
3 and Pretrial Evidence (Doc. No. 1556). Ericsson’s proposed reply is attached as Exhibit A to the
4 declaration of Courtland L. Reichman filed herewith and in support of this motion. As set forth in
5 the proposed reply, Ericsson will be harmed even if all license information at issue is disclosed,
6 disclosure will not lead to market efficiency and will not improve damage determinations, and
7 Reuters failed to address Ericsson’s evidence in support of its motion. Ericsson seeks leave to
8 address these matters.

9
10 DATED: August 8, 2012

Respectively Submitted,

11 By: /s/ Courtland L. Reichman
12 Courtland L. Reichman
13 McKool Smith Hennigan, P.C.
14 303 Twin Dolphin Drive, 6th Fl
15 Redwood Shores, CA 94065

16 *Attorneys for Non-Party*
17 *Telefonaktiebolaget LM Ericsson*
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PROOF OF SERVICE

I am employed in the County of San Mateo, State of California. I am over the age of 18 years and not a party to the within action; my business address is 303 Twin Dolphin Drive, Suite 600, Redwood Shores, California 94065.

On August 8, 2012, all counsel of record who are registered ECF users are being served with a copy of the foregoing document described as **NON-PARTY TELEFONAKTIEBOLAGET LM ERICSSON'S MOTION FOR LEAVE TO FILE REPLY TO THIRD- PARTY INTERVENOR REUTERS AMERICA LLC'S OPPOSITION TO MOTION TO SEAL TRIAL AND PRETRIAL EVIDENCE** via the Electronic Case Filing Program of the United States District Court for the Northern District of California per Local Rule 5-3.3.

Executed on August 8, 2012, at Redwood Shores, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Janet Wasson

Janet Wasson