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9 Attorneys for Plaintiff and
 10 Counterclaim-Defendant APPLE INC.

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

15 APPLE INC., a California corporation,
 16
 17 Plaintiff,
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 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., A
 21 Korean business entity; SAMSUNG
 22 ELECTRONICS AMERICA, INC., a New York
 23 corporation; SAMSUNG
 24 TELECOMMUNICATIONS AMERICA, LLC, a
 25 Delaware limited liability company.,
 26
 27 Defendants.

Case No. 11-cv-01846-LHK

**APPLE'S STIPULATED
 ADMINISTRATIVE MOTION TO
 FILE DOCUMENTS UNDER
 SEAL**

1 In accordance with Civil L.R. 79-5 and 7-11, and General Order No. 62, Apple Inc.
2 (“Apple”) moves this Court for an order to seal:

3 1. The confidential, unredacted version of Apple’s Opposition to Samsung’s Motion to
4 Compel Regarding Request For Production No. 1 and Interrogatory Nos. 1, 3, and 6
5 (“Opposition”);

6 2. The Declaration of Christopher J. Stringer in Support of Apple Inc.’s Opposition to
7 Samsung’s Motion to Compel Regarding Request for Production No. 1 and Interrogatory Nos. 1,
8 3, and 6 (“Stringer Declaration”);

9 3. The confidential, unredacted version of the Declaration of Jason Bartlett in Support of
10 Apple Inc.’s Opposition to Samsung’s Motion to Compel Regarding Request for Production No.
11 1 and Interrogatory Nos. 1, 3, and 6 (“Bartlett Declaration”);

12 4. Exhibits A, B, C, D, E, H, I, and J to the Bartlett Declaration; and

13 5. The Declaration of Patrick Zhang in Support of Apple Inc.’s Opposition to Samsung’s
14 Motion to Compel Regarding Request for Production No. 1 and Interrogatory Nos. 1, 3, and 6
15 (“Zhang Declaration”).

16 Apple has established good cause to permit filing this information under seal through the
17 Declaration of Erica Tierney in Support of Apple’s Administrative Motion to File Documents
18 Under Seal (the “Sealing Declaration”), filed herewith.

19 The Opposition and accompanying Stringer, Bartlett and Zhang Declarations contain
20 information relating to Apple’s design trade secrets, confidential business practices and policies
21 for preserving the secrecy and confidentiality of its product development. (Sealing Decl. at ¶ 2.)
22 It is Apple’s policy and practice not to disclose such information because it is confidential to
23 Apple. (*Id.*) This information is indicative of the way in which Apple manages its business
24 affairs and conducts product development, and thus can be used by Apple’s competitors to its
25 disadvantage. (*Id.*)

26 In conclusion, Apple requests that the Court order that the confidential, unredacted
27 version of Apple’s Opposition to Samsung’s Motion to Compel Regarding Request For
28

1 Production No. 1 and Interrogatory Nos. 1, 3, and 6 and the accompanying declarations and
2 exhibits be filed under seal.

3 Pursuant to General Order No. 62, the complete, unredacted versions of Apple's
4 Opposition, Supporting Declarations, and all Exhibits to the Supporting Declarations will be
5 lodged with the Court for in camera review and served on all parties.

6 Samsung does not oppose this motion.
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8 Dated: September 9, 2011

MORRISON & FOERSTER LLP

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By: /s/ Michael A. Jacobs
MICHAEL A. JACOBS

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Attorneys for Plaintiff
APPLE INC.

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ATTESTATION OF E-FILED SIGNATURE

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I, JASON R. BARTLETT, am the ECF User whose ID and password are being used to
file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michael A.
Jacobs has concurred in this filing.

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Dated: September 9, 2011

By: /s/ Jason R. Bartlett
Jason R. Bartlett

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