

1 HAROLD J. MCELHINNY (CA SBN 66781)
hmcelhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
[mjacobson@mofo.com](mailto:mjacobs@mofo.com)
 3 RICHARD S.J. HUNG (CA SBN 197425)
rhung@mofo.com
 4 MORRISON & FOERSTER LLP
 425 Market Street
 5 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 6 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

Attorneys for Plaintiff and
 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
 Plaintiff,
 17
 v.
 18 SAMSUNG ELECTRONICS CO., LTD., A
 19 Korean business entity; SAMSUNG
 20 ELECTRONICS AMERICA, INC., a New York
 21 corporation; SAMSUNG
 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company.,
 22
 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 Exclude Ordinary Observer Opinions of Apple Expert Cooper Woodring (“Opposition”); and
- 5 2. Exhibits B and C to the Declaration of Patrick J. Zhang in support of Apple’s
6 Opposition (“Zhang Declaration”).

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

10 The Opposition and above-identified exhibits to the Zhang Declarations contain
11 information relating to Apple’s industrial design process and competitive market research.
12 (Sealing Decl. at ¶ 2.) It is Apple’s policy and practice not to disclose such information because
13 it is confidential to Apple. (*Id.*) This information reveals the way in which Apple conducts
14 product development and research into the competitive landscape surrounding its products, and
15 thus can be used by Apple’s competitors to its disadvantage. (*Id.*)

16 In conclusion, Apple requests that the Court order that the confidential, unredacted
17 version of Apple’s Opposition to Samsung’s Motion to Exclude Ordinary Observer Opinions of
18 Apple Expert Cooper Woodring and Exhibits B and C of the supporting Zhang Declaration be
19 filed under seal.

20 Pursuant to General Order No. 62, the complete, unredacted versions of Apple’s
21 Opposition and the Zhang Declaration with unredacted Exhibits will be lodged with the Court for
22 in camera review and served on all parties.

23 Samsung does not oppose this motion.

24 Dated: September 13, 2011

MORRISON & FOERSTER LLP

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26 By: /s/ Jason R. Bartlett
JASON R. BARTLETT

27 Attorneys for Plaintiff
28 APPLE INC.