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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 ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

1 In accordance with Civil L.R. 79-5(d), Apple Inc. (“Apple”) moves this Court for an order
2 to seal:

3 1. Apple’s Motion to Compel Samsung to Produce Documents and Provide Responsive
4 Answers to Propounded Discovery (“Motion to Compel”);

5 2. The Declaration of Jason R. Bartlett in support of the Motion to Compel, including all
6 exhibits; and

7 3. The Declaration of Minn Chung in support of the Motion to Compel.

8 Apple originally filed the Motion to Compel and supporting documents publicly on
9 September 20, 2011, believing that the documents do not contain Samsung confidential
10 information. Samsung has subsequently contacted Apple to request that the documents be
11 withdrawn from public filing. Apple immediately contacted the Northern District of California
12 ECF Helpdesk to request that the documents be removed from the publicly available docket.
13 Apple continues to dispute that any Samsung confidential information is reflected in the Motion
14 to Compel or in the supporting documents. Apple has submitted the Motion to Compel and
15 supporting papers under seal solely to allow Samsung the opportunity to submit a declaration and
16 proposed sealing order pursuant to Local Rule 79-5(d).

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Dated: September 21, 2011

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.