

1 HAROLD J. MCELHINNY (CA SBN 66781)
hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
[mjacobsmofo.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

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,
 18 v.
 19 SAMSUNG ELECTRONICS CO., LTD., A
 Korean business entity; SAMSUNG
 20 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 21 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company.,
 22 Defendants.

Case No. 11-cv-01846-LHK

**APPLE'S STIPULATED
 ADMINISTRATIVE MOTION TO
 FILE UNDER SEAL ITS REPLY
 IN SUPPORT OF ITS MOTION
 FOR PRELIMINARY
 INJUNCTION AND RELATED
 DOCUMENTS**

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

- 3 1. The confidential, unredacted version of Apple’s Reply in Support of its Motion for
4 a Preliminary Injunction (“Reply”);
- 5 2. Paragraphs 2, 5, 6 and 7 of the Reply Declaration of Tony Blevins In Support of
6 Apple’s Motion for a Preliminary Injunction;
- 7 3. The Reply Declaration of Richard J. Lutton, Jr. in Support of Apple’s Motion for a
8 Preliminary Injunction (“Lutton Reply Declaration”);
- 9 4. Exhibits A, B, and C to the Lutton Reply Declaration;
- 10 5. The Reply Declaration of Terry Musika In Support of Apple’s Motion for a
11 Preliminary Injunction (“Musika Declaration”);
- 12 6. Exhibits 1, 2, 3, and 4 to the Musika Declaration;
- 13 7. The Reply Declaration of Arthur Rangel in Support of Apple’s Motion for a
14 Preliminary Injunction (“Rangel Declaration”);
- 15 8. Exhibits A, B, and C to the Rangel Declaration;
- 16 9. Paragraphs 24-26, 27-33, and 39 of the Reply Declaration of Sanjay Sood in
17 Support of Apple’s Motion for a Preliminary Injunction (“Sood Declaration”);
- 18 10. Exhibits D and H to the Sood Declaration;
- 19 11. The Reply Declaration of Christopher Stringer in Support of Apple’s Motion for a
20 Preliminary Injunction (“Stringer Declaration”);
- 21 12. Exhibits 1-9 to the Stringer Declaration;
- 22 13. Paragraphs 11, 16, 26, 27, 38, 42, 44, 49, 51, 57, and 80 of the Reply Declaration
23 of Cooper C. Woodring in Support of Apple’s Motion for a Preliminary Injunction
24 (“Woodring Reply Declaration”);
- 25 14. Exhibit 1 to the Woodring Reply Declaration; and
- 26 15. Exhibits A, B, C, D, M, P, S, W, Z, EE, FF, GG, JJ, KK and LL to the Declaration
27 of Francis Ho in Support of Apple’s Motion for a Preliminary Injunction.
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1 The above items 1-13 and 15 contain or discuss Apple confidential information. Apple
2 has established good cause to permit filing the above Apple confidential information under seal
3 through the Declaration of Erica Tierney in Support of Apple’s Administrative Motion to File
4 Documents Under Seal (the “Sealing Declaration”), filed herewith. As detailed in the Sealing
5 Declaration, the above Apple confidential information relates to, among other things, Apple’s
6 confidential design trade secrets, market research, product development, and business practices.
7 (Sealing Declaration at ¶¶ 3-11.) It is Apple’s policy and practice not to disclose such
8 information because it is confidential to Apple. (*Id.* at ¶ 12.) This information is indicative of the
9 way in which Apple manages its business affairs and conducts product development, and thus the
10 information can be used by competitors to Apple’s disadvantage. (*Id.*) The requested relief is
11 necessary and narrowly tailored to protect the confidentiality of Apple confidential information
12 contained in the Reply and supporting documents.

13 In addition, the above items 1, 5, 6, 13, 14, and 15 contain information that Samsung has
14 designated Confidential or Highly Confidential—Attorneys Eyes Only or information that Apple
15 believes Samsung considers confidential. Regarding sealing the above Samsung confidential
16 information, Apple expects that Samsung will file the required supporting declarations in
17 accordance with Civil L.R. 79-5(d).

18 Pursuant to General Order No. 62, the complete, unredacted versions of these documents
19 will be lodged with the Court for in camera review and served on all parties.

20 Samsung does not oppose this motion.

21
22 Dated: September 30, 2011

MORRISON & FOERSTER LLP

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

25 Attorneys for Plaintiff
26 APPLE INC.
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