

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcclhinny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 8 425 Market Street
 San Francisco, California 94105-2482
 9 Telephone: (415) 268-7000
 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

11 Attorneys for Plaintiff and
 12 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 15 SAN JOSE DIVISION

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

Case No. 11-cv-01846-LHK

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

25
 26
 27
 28

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. Apple’s Motion for a Protective Order (“Motion”);
- 4 2. Declaration of Michael A. Jacobs in Support of Apple’s Motion for a Protective
5 Order and Motion to Shorten Time (“Jacobs Declaration”) and its exhibits;
- 6 3. Apple’s [Proposed] Order Granting Its Motion for a Protective Order;
- 7 4. Apple’s Motion to Shorten Time for Briefing and Hearing on Apple’s Motion for a
8 Protective Order; *and*
- 9 5. Apple’s [Proposed] Order Granting Apple’s Motion to Shorten Time for Briefing
10 and Hearing on Apple’s Motion for a Protective Order.

11 Apple has established good cause to permit the sealing of these materials. First, the above
12 Items 1-5 all discuss or contain references to matters both parties agree are unrelated to the
13 parties’ substantive disputes in this case and are matters of private concern about the manner in
14 which discovery is and will be conducted. These matters are described in the Motion and Jacobs
15 Declaration, above. Further, Items 1 and 2 contain discussions or references to Apple
16 confidential information. As described in the Declaration of Erica Tierney in Support of Apple’s
17 Administrative Motion to File Documents Under Seal (the “Sealing Declaration”), filed herewith,
18 the above Apple confidential information relates to, among other things, Apple’s confidential
19 design trade secrets, product development, and business practices. (Sealing Declaration ¶¶ 4-8.)
20 It is Apple’s policy and practice not to disclose such information because it is confidential to
21 Apple. (*Id.* ¶ 9.) This information is indicative of the way in which Apple manages its business
22 affairs and conducts product development, and thus the information can be used by competitors to
23 Apple’s disadvantage. (*Id.*) The requested relief is necessary and narrowly tailored to protect the
24 confidentiality of the information contained in the above materials.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Samsung has indicated that it does not oppose this motion. (Jacobs Declaration ¶ 12.)

Dated: October 27, 2011

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.