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Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

APPLE INC., a California corporation,
 Plaintiff,
 v.
 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 AMERICA, INC., a New York corporation;
 SAMSUNG TELECOMMUNICATIONS
 AMERICA, LLC, a Delaware limited liability
 company.,
 Defendants.

Case No. 11-cv-01846-LHK

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

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 Opposition to Samsung’s Motion to Compel Apple to Produce Documents
4 and Things);
- 5 2. Declaration of Michael A. Jacobs in Opposition to Samsung’s Motion to Compel
6 Documents and Things (“Jacobs Declaration”) and its exhibit;
- 7 3. Declaration of Wesley E. Overson in Opposition to Samsung’s Motion to Compel
8 Documents and Things;
- 9 4. Declaration of Erik J. Olson in Opposition to Samsung’s Motion to Compel
10 Documents and Things and its exhibits other than Exhibit 7 and Exhibit 9;
- 11 5. Declaration of Quin Hoellwarth in Opposition to Samsung’s Motion to Compel
12 Documents and Things; and
- 13 6. Declaration of Evans Hankey in Opposition to Samsung’s Motion to Compel
14 Documents and Things and its exhibits.

15 Apple has established good cause to permit the sealing of these materials. First, the
16 documents contain discussions or references to Apple confidential information. As described in
17 the Declaration of Cyndi Wheeler in Support of Apple’s Administrative Motion to File
18 Documents Under Seal (the “Sealing Declaration”), filed herewith, the above documents discuss
19 and disclose, among other things, details related to Apple’s confidential design process, device
20 prototypes, and business practices. (Sealing Declaration ¶¶ 4-6.) It is Apple’s policy and practice
21 not to disclose such information because it is confidential to Apple. (*Id.* ¶ 3.) This information is
22 indicative of the way in which Apple manages its business affairs and conducts product
23 development, and thus the information can be used by competitors to Apple’s disadvantage. (*Id.*)
24 Furthermore, many of the above items discuss or contain references to matters both parties agree
25 are unrelated to the parties’ substantive disputes in this case and are matters of private concern
26 about the manner in which discovery is and will be conducted.

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The requested relief is necessary and narrowly tailored to protect the confidentiality of the information contained in the above materials. Samsung has indicated that it does not oppose this motion. (Jacobs Declaration ¶ 8.)

Dated: October 31, 2011

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.