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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.
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Case No. 11-cv-01846-LHK
**APPLE'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

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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 Inc.’s Motion To Compel Production Of Documents And Things;
- 4 2. Declaration of Mia Mazza In Support of Apple’s Motion To Compel Production
5 Of Documents And Things;
- 6 3. Exhibits 3, 10, 12, 13, and 15 to the Declaration of Mia Mazza In Support of
7 Apple’s Motion To Compel Production Of Documents And Things;
- 8 4. Declaration of Minn Chung In Support of Apple’s Motion to Compel Production
9 of Documents and Things; and
- 10 5. Exhibits A - D to the Declaration of Minn Chung In Support of Apple’s Motion to
11 Compel Production of Documents and Things.

12 The above documents discuss and refer to documents and matters that Samsung has
13 designated as confidential under the interim protective order. Apple expects that pursuant to Civil
14 Local Rule 79(d), Samsung will file a declaration establishing good cause to permit the sealing of
15 these materials.

16 Apple’s filing will be lodged with the Court for in camera review and served on all parties.
17 Proposed redacted versions of items 1-4 above are attached as Exhibits 1-8 hereto.

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19 Dated: December 8, 2011

MORRISON & FOERSTER LLP

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21 By: /s/ Michael Jacobs

MICHAEL JACOBS

22 Attorneys for Plaintiff
23 APPLE INC.
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