

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 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 Opposition to Samsung’s Motion to Compel, filed herewith.
- 4 2. Declaration of Mia Mazza In Support of Apple’s Opposition to Samsung’s Motion  
5 to Compel, filed herewith.
- 6 3. Apple’s Opposition to Samsung’s Motion to Permit Samsung’s Expert Itay  
7 Sherman to Review Design Materials Designated Under the Protective Order, filed  
8 herewith.
- 9 4. Exhibits 3-6 to the Declaration of Esther Kim in Support of Apple’s Opposition to  
10 Samsung’s Motion to Permit Samsung’s Expert Itay Sherman to Review Design  
11 Materials Designated Under the Protective Order, filed herewith.
- 12 5. Samsung’s Notice of Motion and Motion to Compel Apple to Produce Documents  
13 and Things and Provide Responsive Answers to Propounded Discovery;  
14 Memorandum of Points and Authorities in Support Thereof (“Samsung’s Motion  
15 to Compel”), filed on December 13, 2011.
- 16 6. Declaration of Diane C. Hutnyan in Support of Samsung’s Motion to Compel  
17 Production of Documents and Things and Provide Responsive Answers to  
18 Propounded Discovery (“Hutnyan Decl.”), filed on December 13. 2011.
- 19 7. Hutnyan Decl. Exhibits 1-13 and 15-21.

20 The above items 1-6 discuss and refer to documents and matters that Apple has designated  
21 as confidential under the interim protective order. The Declaration of Cyndi Wheeler in Support  
22 of Apple’s Administrative Motion to File Documents Under Seal, filed herewith, establishes good  
23 cause to permit the sealing of these materials. Items 7 and 8 contains information that Samsung  
24 has designated as confidential. Apple expects that pursuant to Civil Local Rule 79(d), Samsung  
25 will file a declaration establishing good cause to permit the sealing of these materials.

1 Proposed redacted versions of items 1 and 2 are attached hereto as Exhibits A and B.  
2 Samsung has filed proposed redacted versions of items 3 and 4 on December 13, 2011, in  
3 conjunction with Samsung's Motion to Compel.  
4

5 Dated: December 15, 2011

MORRISON & FOERSTER LLP

6

7 By: /s/ Richard S.J. Hung  
Richard S.J. Hung

8

Attorneys for Plaintiff  
APPLE INC.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28