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 APPLE INC.

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA
 13 SAN JOSE DIVISION

15 APPLE INC., a California corporation,
 16 Plaintiff,
 17 v.
 18 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG ELECTRONICS
 19 AMERICA, INC., a New York corporation; and
 SAMSUNG TELECOMMUNICATIONS
 20 AMERICA LLC, a Delaware limited liability
 company,
 21 Defendants.
 22

Case No. 11-cv-01846-LHK

**ADMINISTRATIVE MOTION TO
 SEAL APPLE'S MOTION TO
 AUGMENT RECORD ON ITS
 MOTION FOR PRELIMINARY
 INJUNCTION**

1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple moves this
2 Court for an Order sealing portions of: (1) Apple’s Administrative Motion to Augment Record on
3 Its Motion for Preliminary Injunction, which was filed on Oct. 11, 2011 (“Motion to Augment”);
4 and (2) Declaration of Minn Chung in Support of Apple’s Administrative Motion to Augment
5 Record (“Chung Decl.”).

6 Section B.1 of the Motion to Augment discusses Exhibits A through D of the Chung
7 Decl., which Samsung had designated as “Highly Confidential—Attorneys Eyes Only.” Section
8 B.2 of the Motion to Augment discusses Exhibit E of the Chung Declaration, which Samsung
9 also had designated as “Highly Confidential—Attorneys’ Eyes Only.” Paragraphs 3 through 6 of
10 the Chung Declaration discuss Exhibits A through D. Paragraph 7 of the Chung Declaration
11 discusses Exhibit E.

12 The Court’s December 16, 2011, Order granted Apple’s request to seal Exhibits A through
13 D, but denied the request to seal Exhibit E. *See* Order Granting in Part and Denying in Part
14 Motion to Seal (Dkt. 510) (“Order”).

15 Samsung has informed Apple that Samsung plans to ask the Court to reconsider its
16 decision not to seal Exhibit E to the Chung Declaration. Apple is therefore *lodging* herewith a
17 redacted version of the Motion to Augment, narrowly tailored to seal only Section B.1. It also
18 has lodged herewith a redacted version of the Chung Declaration, narrowly tailored to seal
19 portions of only Paragraphs 3 through 6. In the event Samsung’s motion for reconsideration is
20 granted, revised versions of the Motion to Augment and Chung Declaration lodged herewith will
21 need to be submitted.

22 Dated: December 20, 2011

MORRISON & FOERSTER LLP

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

25
26 Attorneys for Plaintiff
APPLE INC.