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Attorneys for Plaintiff and  
 Counterclaim-Defendant Apple Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

13 APPLE INC., a California corporation,  
 14 Plaintiff,  
 15 vs.  
 16 SAMSUNG ELECTRONICS CO., LTD., a  
 17 Korean business entity, SAMSUNG  
 18 ELECTRONICS AMERICA, INC., a New  
 19 York corporation, and SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 20 LLC, a Delaware limited liability company,  
 Defendants.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S ADMINISTRATIVE  
 MOTION TO FILE DOCUMENTS  
 UNDER SEAL**

21 SAMSUNG ELECTRONICS CO., LTD., a  
 22 Korean business entity, SAMSUNG  
 23 ELECTRONICS AMERICA, INC., a New  
 24 York corporation, and SAMSUNG  
 TELECOMMUNICATIONS AMERICA,  
 LLC, a Delaware limited liability company,  
 25 Counterclaim-Plaintiffs,  
 26 v.  
 27 APPLE INC., a California corporation,  
 28 Counterclaim-Defendant.

1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple Inc.  
2 (“Apple”) moves for an order to seal the following documents:

3 1. Confidential portions of Apple’s Responsive Claim Construction Brief, filed  
4 herewith.

5 2. Exhibits F, R and S to the Declaration of Mark D. Selwyn in Support of Apple’s  
6 Responsive Claim Construction Brief, filed herewith.

7 The above items contain information that Samsung has designated as confidential under  
8 the interim protective order. Apple expects that pursuant to Civil Local Rule 79-5(d), Samsung  
9 will file a declaration, and accompanying Proposed Order, attempting to establish good cause to  
10 permit the sealing of these materials.

11 Pursuant to the Court’s standing order regarding motions to file under seal, effective  
12 December 1, 2011, attached are the proposed public redacted versions of the documents that  
13 Apple is seeking to file under seal.

14 Pursuant to General Order No. 62, Apple’s entire filing will be lodged with the Court for  
15 in camera review and served on all parties.

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1 Dated: December 22, 2011  
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3 /s/ Mark. D Selwyn  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on December 22, 2011 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.4. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Mark. D Selwyn  
Mark D. Selwyn