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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; and
SAMSUNG TELECOMMUNICATIONS
AMERICA LLC, a Delaware limited liability
company,

Defendants.

Case No. 11-cv-01846-LHK

**ADMINISTRATIVE MOTION TO
SEAL APPLE'S MOTION TO
COMPEL**

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 Motion to Compel Production of Documents and Things;
- 4 2. Exhibits A, H, and J to the Declaration of Mia Mazza in Support of Apple’s
5 Motion to Compel Production of Documents and Things (“Mazza Declaration”).

6 The above items contain material that Samsung has designated as confidential under the
7 interim protective order. In particular, item 1 includes references to a deposition transcript that
8 Samsung designated as containing confidential business information. Exhibit A to the Mazza
9 Declaration consists of the selections to the deposition transcript designated by Samsung as
10 containing confidential business information referenced in item 1. Exhibit H to the Mazza
11 Declaration is a letter containing references to documents that were designated by Samsung as
12 confidential when produced. Exhibit J to the Mazza Declaration is a letter sent by Samsung to
13 Apple that Samsung’s counsel subsequently designated as Highly Confidential.

14 Apple expects that pursuant to Civil L.R. 79-5(d), Samsung will file a declaration
15 establishing good cause to permit the sealing of these materials. Proposed public redacted
16 versions of the documents listed above are attached hereto as exhibits if appropriate.

17 Dated: January 11, 2012

MORRISON & FOERSTER LLP

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20 By: /s/ Michael A. Jacobs
Michael A. Jacobs

21 Attorneys for Plaintiff
22 APPLE INC.
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