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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

**APPLE'S RENEWED  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER  
SEAL**

1 In accordance with Civil L.R. 7-11 and 79-5, General Order No. 62, and pursuant to the  
2 Court's January 9, 2012 Order (ECF No. 593), Apple Inc. ("Apple") submits this renewed motion  
3 for an order to seal portions of the following documents:

- 4 1. Exhibit B to the Declaration of Todd M. Briggs in Support of Samsung's Response  
5 to Apple's Opening Claim Construction Brief ("Briggs Declaration," ECF No. 542-1);
- 6 2. Exhibit I to the Briggs Declaration;
- 7 3. Exhibit J to the Briggs Declaration;
- 8 4. Samsung's Response to Apple's Opening Claim Construction Brief.

9 The above documents contain information that is highly confidential. This motion  
10 requests relief that is necessary and narrowly tailored to protect only that confidential  
11 information.

12 Exhibit B to the Briggs Declaration contains a confidential Apple engineering  
13 requirements specification and discussion of that specification in a deposition transcript. (*See*  
14 Declaration of Cyndi Wheeler in Support of Apple's Renewed Motion to File Documents Under  
15 Seal ¶ 2) ("Wheeler Declaration"). Apple requests that the Court seal lines 8-25 on page 7 of  
16 Exhibit B, which describe in detail the internal engineering document; lines 1-2, a portion of line  
17 3, line 7, and lines 19-25 on page 8 of Exhibit B, which further describe the details of the  
18 confidential document; and pages 13-31 of Exhibit B, which consist of the confidential  
19 engineering document itself.

20 Exhibit I to the Briggs Declaration contains a brief discussion of a specific element of a  
21 confidential prototype design. (*Id.*) Apple requests that the Court seal lines 20-25 on page 7 of  
22 Exhibit I and line 1 on page 8 of Exhibit I, which contain this discussion.

23 Exhibit J to the Briggs Declaration contains discussion of a specific element of a  
24 confidential prototype design. (*Id.*) Apple requests that the Court seal lines 7-17 on page 7 of  
25 Exhibit J, which contain this discussion.

26 Samsung's Response to Apple's Opening Claim Construction Brief contains a reference to  
27 the confidential portion of Exhibit B to the Briggs Declaration, described above. (*Id.*) Apple  
28 requests that the Court seal the descriptive parentheticals at the end of footnote 2 in Samsung's

1 Response to Apple's Opening Claim Construction Brief stating the title of and quoting from the  
2 confidential engineering document.

3 It is Apple's policy not to disclose or describe its confidential design, trade secrets, or  
4 product development, including in particular the details of its unreleased prototypes, to third  
5 parties. (*Id.* ¶ 3.) The confidential material described above all relates to such trade secret  
6 information, as each of the three exhibits contains portions discussing confidential engineering  
7 information or unreleased prototype design and development, and the referenced brief quotes  
8 from the confidential portion of one of the exhibits. (*Id.*) This information is highly confidential  
9 to Apple. (*Id.*) It is indicative of the way that Apple designs its products and conducts its product  
10 development. (*Id.*) The information described above could be used by Apple's competitors to  
11 Apple's disadvantage if disclosed publicly. (*Id.*) The relief requested in this renewed motion is  
12 necessary and is narrowly tailored to protect confidential information, focusing only on specific  
13 portions of the documents at issue. (*Id.*)

14 Proposed public redacted versions of the documents listed above are attached. Pursuant to  
15 Civil L.R. 79-(c), Apple will lodge with the Clerk the documents at issue with the sealable  
16 portions highlighted. Samsung's Response to Apple's Opening Claim Construction Brief is  
17 lodged with the sealable portions in red outline, as the underlying document has highlighting that  
18 Apple is unable to remove from its copy.

19 Dated: January 12, 2012

MORRISON & FOERSTER LLP

21 By: /s/ Richard S.J. Hung  
22 Richard S.J. Hung

23 Attorneys for Plaintiff  
24 APPLE INC.