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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 ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL**

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

3 1. Exhibits B, C, F, G, and H to the Declaration of Jason Bartlett in Support of
4 Apple’s Opposition to Samsung’s Motion to Enforce Various Court Orders and the Declaration to
5 the extent that it refers to those exhibits.

6 2. Portions of Apple’s Opposition to Samsung’s Motion to Enforce Various Court
7 Orders.

8 3. Portions of the Declaration of Samuel J. Maselli in Support of Apple’s Opposition
9 to Samsung’s Motion to Compel.

10 4. Portions of Apple’s Opposition to Samsung’s Motion to Compel.

11 5. Exhibits B and C to the Declaration of Mia Mazza in Support of Apple’s
12 Opposition to Motion for Clarification.

13 The above documents contain information that is highly confidential as set out in the
14 Declaration of Cyndi Wheeler in Support of Apple’s Administrative Motion to File Documents
15 Under Seal (“Wheeler Declaration”), filed herewith under seal. As described in the Wheeler
16 Declaration, this motion requests relief that is necessary and narrowly tailored to protect only that
17 confidential information.

18 It is Apple’s policy not to disclose or describe to third parties its confidential design, trade
19 secrets, or product development. (Wheeler Declaration ¶ 4.) The Apple-confidential and third
20 party-confidential material in the above-referenced documents relates to such trade secret
21 information, as detailed in the Wheeler Declaration. (*Id.* ¶¶ 5-7.) This information is highly
22 confidential to Apple. (*Id.*) The information described above could be used by Apple’s
23 competitors to Apple’s disadvantage if disclosed publicly. (*Id.*)

24 The relief requested in this motion is necessary and is narrowly tailored to protect
25 confidential information, focusing only on specific portions of the documents at issue. (*Id.* ¶ 8.)
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Proposed public redacted versions of the documents listed above are attached where appropriate. Pursuant to Civil L.R. 79-(c), Apple will lodge with the Clerk the documents at issue with the sealable portions highlighted.

Dated: January 17, 2012

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.