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 12 Counterclaim-Defendant APPLE INC.

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 SAN JOSE DIVISION

17 APPLE INC., a California corporation,  
 18  
 Plaintiff,  
 19  
 v.  
 20  
 21 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG ELECTRONICS  
 AMERICA, INC., a New York corporation; and  
 22 SAMSUNG TELECOMMUNICATIONS  
 AMERICA LLC, a Delaware limited liability  
 23 company,  
 24  
 Defendants.

Case No. 11-cv-01846-LHK (PSG)  
**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. The confidential, unredacted version of Apple Inc.’s Motion for Rule 37(B)(2)  
4 Sanctions For Samsung’s Violation of Two Discovery Orders (“Motion”);

5 2. The confidential, unredacted version of the Declaration of Minn Chung in Support  
6 of Apple Inc’s Motion for Rule 37(B)(2) Sanctions For Samsung’s Violation of Two Discovery  
7 Orders (“Chung Decl.”);

8 3. Exhibits A-S, U, W, X, & BB to the Chung Declaration;

9 4. The Proposed Order Granting Apple Inc.’s Motion For Rule 37(B)(2) Sanctions  
10 For Samsung’s Violation Of Two Discovery Orders.

11 The above items contain material that Samsung has designated as confidential under the  
12 protective order entered in this case. Apple expects that pursuant to Civil L.R. 79-5(d), Samsung  
13 will file a declaration establishing good cause to permit the sealing of these materials. In  
14 addition, the Motion at page 20 lines 10-14 contains information that the Court has previously  
15 sealed. (*See* Dkt. No. 269 (Order Granting Samsung’s Administrative Motion to File Under  
16 Seal); Dkt. No. 126 (Order Granting Apple’s Motion to File Documents Under Seal); Dkt. No.  
17 452 (Order Denying Motion for Preliminary Injunction (Redacted).) The relief requested in this  
18 motion is narrowly tailored to protect only information that has been designated as confidential.  
19 Proposed public redacted versions of items 1 and 2 are attached as exhibits hereto. Pursuant to  
20 Civil L.R. 79-(c), Apple will lodge with the Clerk the documents at issue with the sealable  
21 portions highlighted.

22 Dated: February 8, 2012

MORRISON & FOERSTER LLP

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24  
25 By: /s/ Michael A. Jacobs  
Michael A. Jacobs

26 Attorneys for Plaintiff  
27 APPLE INC.  
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