HAROLD J. MCELHINNY (CA SBN 66781) hmcelhinny@mofo.com MICHAEL A. JACOBS (CA SBN 111664) mjacobs@mofo.com JISNNIFER LEE TAYLOR (CA SBN 161368) jaylor@mofo.com ALISON M. TUCHER (CA SBN 171363) atucher@mofo.com RICHARD S.J. HUNG (CA SBN 197425) thung@mofo.com MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: (415) 268-7000 Facsimile: (415) 268-7522  MARK D. SELWYN (SBN 244180) mark.selwyn@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP MARK D. SELWYN (SBN 244180) mark.selwyn@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 950 Page Mill Road Palo Alto California 94105-2482 Telephone: (415) 268-7522 Telephone: (450) 858-6100  MARK D. SELWYN (SBN 244180) mark.selwyn@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 950 Page Mill Road Palo Alto California 94304 Telephone: (650) 858-6100  To 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.  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, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company,  Defendants.			
2 MICHAELA, JACOBS (CA SBN 111664) mjacobs@mofo.com JENNIFER LEE TAYLOR (CA SBN 161368) jtaylor@mofo.com ALISON M. TUCHER (CA SBN 171363) attacher@mofo.com RICHARD S.J. HUNG (CA SBN 197425) rhung@mofo.com JASON R. BARTLETT (CA SBN 214530) jasonbarlett@mofo.com MorrISON & FOERSTER LLP 425 Market Street San Francisco. California 94105-2482 Telephone: (415) 268-7522 Tourier (550) 858-6100  Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  10 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  11 APPLE INC., a California corporation, Reliantiff, V. SAMSUNG ELECTRONICS CO., L.T.D., a Korean corporation; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company, Defendants.	1		
JÉNNIFER LEE TAYLOR (CA SBN 161368)  jiaylor@mofo.com ALISON M. TUCHER (CA SBN 171363) atucher@mofo.com RICHARD S.J. HUNG (CA SBN 197425) rhung@mofo.com JASON R. BARTLETT (CA SBN 214530) jasonbartlett@mofo.com MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: (415) 268-7002 Facsimile: (415) 268-7522  Telephone: (415) 268-7522  Telephone: (45) 858-6000 Facsimile: (650) 858-6000 Facsimile: (650) 858-6100  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, LIC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA, LIC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA, LIC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LIC., a Delaware limited liability company, Defendants.	2	MICHAEL A. JACOBS (CA SBN 111664)	WILMER CUTLER PICKERING
ALISON M. TUCHER (CA SBN 171363) atucher@mofo.com RICHARD S.J. HUNG (CA SBN 197425) rhung@mofo.com JASON R. BARTLETT (CA SBN 214530) jasonbartlett@mofo.com MORISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: (415) 268-7502  Telephone: (415) 268-7522  Telephone: (650) 858-6000 Facsimile: (650) 858-6000 Facsimile: (650) 858-6000 Facsimile: (650) 858-6100  To 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; AMSUNG ELECTRONICS AMERICA, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company, Defendants.	3	JĔNNIFER LEE TAYLOR (CA SBN 161368)	50 State Street
5 RICHARD S.J. HUNG (CA SBN 197425) rhung@mofo.com JASON R. BARTLETT (CA SBN 214530) jasonbartlett@mofo.com MORISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: (415) 268-7000 Facsimile: (415) 268-7522  10  Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  11  Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  12  13  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, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company, Defendants.	4	ALISON M. TUCHER (CA SBN 171363)	Γelephone: (617) 526-6000
JASÔN R. BARTLETT (CA SBN 214530)   jasonbartlett@mofo.com   MORRISON & FOERSTER LLP   425 Market Street   425 Market Street   426 Market Street   426 Market Street   427 Market Street   428 Market Street   428 Market Street   429 Market Street   429 Market Street   429 Market Street   429 Market Street   420 Alto. California 94304   421 California 94304   422 Market Street   429 Department of Plaintiff and   420 Alto. California 94304   422 Market Street   429 Department of Plaintiff and   420 Alto. California 94304   420 Alto. C	5	RICHARD S.J. HUNG (CA SBN 197425)	racsinine: (617) 326-3000
MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 Telephone: (415) 268-7000 Facsimile: (415) 268-7522  Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  12  13  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 corporations and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company, Defendants.  WILMER CUTLER PICKERING HALE AND DORR LLP 950 Page Mill Road Palo Alto, California 94304 Palo Alto, California py300 Page Mill Road Palo Alto, California 94304	6	JASON R. BARTLETT (CA SBN 214530)	
San Francisco, California 94105-2482 Telephone: (415) 268-7000 Facsimile: (415) 268-7522 Telephone: (650) 858-6000 Facsimile: (650) 858-6000 Facsimile: (650) 858-6100  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.	7	MORRISON & FOERSTER LLP	WILMER CUTLER PICKERING
Facsimile: (415) 268-7522 Telephone: (650) 858-6000 Facsimile: (650) 858-6100  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.	8	San Francisco, California 94105-2482	950 Page Mill Road
Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  12 13 14 15 15 16 17 18 18 19 20 21 21 22 23 21 24 25 26 27 28 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  18 20 21 21 22 23 24 24 25 26 27 28 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  21 22 23 24 25 26 27 28 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  25 26 27 28 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  26 27 28 Attorneys for Plaintiff and Counterclaim-Defendant APPLE INC.  28 Case No. 11-cv-01846-LHK (PSG)  APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL	9	Facsimile: (415) 268-7522	Γelephone: (650) 858-6000
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 (PSG)  APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL	10		Facsimile: (650) 858-6100
12 13 14 15 16 17 18 19 19 20 21 21 22 23 24 28 28 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION  Case No. 11-cv-01846-LHK (PSG) APPLE INC., a California corporation, Plaintiff, v.  Case No. 11-cv-01846-LHK (PSG) APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL  Case No. 11-cv-01846-LHK (PSG) APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL	11		
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.	12	Counterclaim-Defendant APPLE INC.	
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.  Defendants.	13	UNITED STATES DISTRICT COURT	
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 (PSG)  APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL	14		
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 (PSG)  APPLE'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL  Defendants.	15		
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.	16		
Plaintiff,  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.	17	ADDI E INC. a California corneration	Casa No. 11 av 01846 I HK (DSC)
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.	18	-	
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.	19	,	MOTION TO FILE DOCUMENTS
Korean corporation; SAMSUNG ELECTRONICS AMERICA, INC., a New York corporation; and SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company,  Defendants.	20		UNDER SEAL
SAMSUNG TELECOMMUNICATIONS AMERICA LLC, a Delaware limited liability company,  Defendants.  25  26  27  28	21	Korean corporation; SAMSUNG ELECTRONICS	
23 company, 24 Defendants. 25 26 27 28	22	SAMSUNG TELECOMMUNICATIONS	
25 26 27 28	23	ANIERICA LLC, a Delawale milited hability	
<ul><li>26</li><li>27</li><li>28</li></ul>		company,	
27 28	24		
28			
	25		
	25 26		

Apple's Administrative Motion to File Documents Under Seal Case No. 11-cv-01846-LHK sf-3107598

In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62, Apple Inc. ("Apple") submits this motion for an order to seal the following documents or portions thereof:

- 1. The confidential, unredacted version of Apple's Motion To Compel Depositions of 14 of Samsung's Purported "Apex" Witnesses ("Motion to Compel");
- 2. The confidential, unredacted version of the Declaration of Mia Mazza In Support of Apple's Motion To Compel Depositions of 14 of Samsung's Purported "Apex" Witnesses ("Mazza Declaration");
  - 3. Exhibits 1-14 and 17-55 to the Mazza Declaration.

The above items contain materials that Samsung has designated as confidential under the protective order entered in this case. Apple expects that pursuant to Civil Local Rule 79-5(d), Samsung will file a declaration establishing good cause to permit the sealing of these materials.

Item 1 above contains materials that Apple has designated a confidential under the protective order entered in this case. Specifically, Apple's Motion to Compel discusses Appleconfidential exhibits that are not publicly available and that could be used by Apple's competitors to Apple's disadvantage. Apple has established good cause to permit the sealing of these materials through the Declaration of Cyndi Wheeler in Support of Apple's Administrative Motion to File Documents Under Seal, filed concurrently with the Declaration of S. Calvin Walden in Support of Apple's Motion to Compel Depositions of 14 of Samsung's Purported "Apex" Witnesses.

28

Proposed redacted versions of Items 1-2 are attached as exhibits hereto. Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at issue with the sealable portions highlighted. Dated: February 16, 2012 MORRISON & FOERSTER LLP By: /s/Michael A. Jacobs Michael A. Jacobs Attorneys for Plaintiff APPLE INC.