

1 HAROLD J. MCELHINNY (CA SBN 66781)
 hmcelhenny@mofo.com
 2 MICHAEL A. JACOBS (CA SBN 111664)
 mjacobs@mofo.com
 3 JENNIFER LEE TAYLOR (CA SBN 161368)
 jtaylor@mofo.com
 4 ALISON M. TUCHER (CA SBN 171363)
 atucher@mofo.com
 5 RICHARD S.J. HUNG (CA SBN 197425)
 rhung@mofo.com
 6 JASON R. BARTLETT (CA SBN 214530)
 jasonbartlett@mofo.com
 7 MORRISON & FOERSTER LLP
 425 Market Street
 8 San Francisco, California 94105-2482
 Telephone: (415) 268-7000
 9 Facsimile: (415) 268-7522

WILLIAM F. LEE
 william.lee@wilmerhale.com
 WILMER CUTLER PICKERING
 HALE AND DORR LLP
 60 State Street
 Boston, MA 02109
 Telephone: (617) 526-6000
 Facsimile: (617) 526-5000

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) 858-6000
 Facsimile: (650) 858-6100

11 Attorneys for Plaintiff and
 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,
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 Plaintiff,
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 v.
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 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 Local Rules 7-11 and 79-5, and General Order No. 62,
2 Apple Inc. (“Apple”) submits this motion for an order to seal the following documents or portions
3 thereof:

4 1. The confidential, unredacted version of Apple’s Motion To Compel Depositions of
5 14 of Samsung’s Purported “Apex” Witnesses (“Motion to Compel”);

6 2. The confidential, unredacted version of the Declaration of Mia Mazza In Support
7 of Apple’s Motion To Compel Depositions of 14 of Samsung’s Purported “Apex” Witnesses
8 (“Mazza Declaration”);

9 3. Exhibits 1-14 and 17-55 to the Mazza Declaration.

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

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

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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.