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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
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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
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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		
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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	
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Apple's Administrative Motion to File Documents Under Seal Case No. 11-cv-01846-LHK sf-3108208

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 the Declaration of S. Calvin Walden in Support of Apple's Motion to Compel Depositions of 14 of Samsung's Purported "Apex" Witnesses ("Walden Declaration");
 - 2. Exhibits 2 through 6 and 21 through 25 to the Walden Declaration;
 - Exhibits 7 through 10 to the Walden Declaration. 3.

Item 2 above consists of exhibits 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 may contain Samsung-confidential information to the extent it incorporates the exhibits in Item 2.

Item 3 above consists of exhibits that Apple has designated as confidential under the protective order entered in this case. These exhibits contain Apple-confidential information that is 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 herewith.

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A proposed redacted version of Item 1 is attached as an exhibit 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.