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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 the Declaration of S. Calvin Walden in
5 Support of Apple’s Motion to Compel Depositions of 14 of Samsung’s Purported “Apex”
6 Witnesses (“Walden Declaration”);

7 2. Exhibits 2 through 6 and 21 through 25 to the Walden Declaration;

8 3. Exhibits 7 through 10 to the Walden Declaration.

9 Item 2 above consists of exhibits that Samsung has designated as confidential under the
10 protective order entered in this case. Apple expects that pursuant to Civil Local Rule 79-5(d),
11 Samsung will file a declaration establishing good cause to permit the sealing of these materials.
12 Item 1 above may contain Samsung-confidential information to the extent it incorporates the
13 exhibits in Item 2.

14 Item 3 above consists of exhibits that Apple has designated as confidential under the
15 protective order entered in this case. These exhibits contain Apple-confidential information that
16 is not publicly available and that could be used by Apple’s competitors to Apple’s disadvantage.
17 Apple has established good cause to permit the sealing of these materials through the Declaration
18 of Cyndi Wheeler in Support of Apple’s Administrative Motion to File Documents Under Seal,
19 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.