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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,  
 18  
 Plaintiff,  
 19  
 v.  
 20  
 21 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG ELECTRONICS  
 22 AMERICA, INC., a New York corporation; and  
 SAMSUNG TELECOMMUNICATIONS  
 23 AMERICA LLC, a Delaware limited liability  
 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 Rule 37(b)(2) Motion re  
5 Samsung’s Violation of January 27, 2012 Damages Discovery Order;

6 2. The confidential, unredacted version of the Declaration of Erik Olson In Support  
7 of Apple’s Rule 37(b)(2) Motion (“Olson Declaration”);

8 3. The confidential, unredacted version of the Declaration of Eric Roberts In Support  
9 of Apple’s Rule 37(b)(2) Motion (“Roberts Declaration”);

10 4. Exhibits 1–19 to the Olson Declaration;

11 5. Exhibits A–F to the Roberts Declaration.

12 The above items contain material that Samsung has designated as confidential under the  
13 protective order entered in this case. Apple expects that pursuant to Civil Local Rule 79-5(d),  
14 Samsung will file a declaration establishing good cause to permit the sealing of these materials.  
15 Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at issue with  
16 the sealable portions highlighted. Redacted versions of the documents at issue are attached as  
17 exhibits hereto.

18 Dated: February 28, 2012

MORRISON & FOERSTER LLP

20  
21 By: /s/ Michael A. Jacobs  
Michael A. Jacobs

22 Attorneys for Plaintiff  
23 APPLE INC.