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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
 19 Plaintiff,

20 v.

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 Reply in Support of Motion for
5 Rule 37(b)(2) Sanctions for Samsung's Violation of Two Discovery Orders ("Reply");

6 2. The confidential, unredacted version of the Reply Declaration of Minn Chung in
7 Support of Apple's Reply ("Chung Decl.");

8 3. The confidential, unredacted version of the Reply Declaration of Erik J. Olson in
9 Support of Apple's Reply ("Olson Decl.");

10 4. Exhibits A to S to the Chung Declaration; and

11 5. Exhibits 1 to 2 to the Olson Declaration.

12 The above item contains materials 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. A proposed redacted version of items 1-3 are attached as
17 exhibits hereto.

18 Dated: March 5, 2012

MORRISON & FOERSTER LLP

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

22 Attorneys for Plaintiff
23 APPLE INC.
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