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Attorneys for Plaintiff and
 Counterclaim-Defendant Apple Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

13 APPLE INC., a California corporation,
 14 Plaintiff,
 15 vs.
 16 SAMSUNG ELECTRONICS CO., LTD., a
 17 Korean business entity, SAMSUNG
 18 ELECTRONICS AMERICA, INC., a New
 19 York corporation, and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 20 LLC, a Delaware limited liability company,
 Defendants.

Civil Action No. 11-CV-01846-LHK

**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL**

21 SAMSUNG ELECTRONICS CO., LTD., a
 22 Korean business entity, SAMSUNG
 23 ELECTRONICS AMERICA, INC., a New
 24 York corporation, and SAMSUNG
 TELECOMMUNICATIONS AMERICA,
 25 LLC, a Delaware limited liability company,
 Counterclaim-Plaintiffs,
 26 v.
 27 APPLE INC., a California corporation,
 Counterclaim-Defendant.
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1 In accordance with Civil L.R. 7-11 and 79-5, and General Order No. 62, Apple Inc.
2 (“Apple”) moves for an order to seal the following documents:

- 3 1. Confidential portions of Apple’s Notice of Motion and Motion to Compel, filed
4 herewith.
- 5 2. Exhibits 12 and 13 to the Declaration of S. Calvin Walden in Support of Apple’s
6 Notice of Motion and Motion to Compel, filed herewith.

7 The above items contain information that Samsung has designated as confidential under
8 the interim protective order. Apple expects that pursuant to Civil Local Rule 79-5(d), Samsung
9 will file a declaration, and accompanying Proposed Order, attempting to establish good cause to
10 permit the sealing of these materials.

11 Pursuant to the Court’s standing order regarding motions to file under seal, effective
12 December 1, 2011, attached are the proposed public redacted versions of the documents that
13 Apple is seeking to file under seal.

14 Pursuant to General Order No. 62, Apple’s entire filing will be lodged with the Court for
15 in camera review and served on all parties.

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1 Dated: March 15, 2012
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3 /s/ Mark. D Selwyn
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