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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
 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 Brief in Support of Rule
5 37(b)(2) Motion Re: Samsung’s Violation of January 27, 2012 Damages Discovery Order;

6 2. The confidential, unredacted version of the Declaration Of Erik J. Olson in
7 Support of Apple’s Reply in Support of Rule 37(B)(2) Motion Re: Samsung’s Violation of
8 January 27, 2012 Damages Discovery Order (“Olson Reply Declaration”);

9 3. The confidential, unredacted version of the Declaration of Eric R. Roberts in
10 Support of Apple’s Reply in Support of Rule 37(b)(2) Motion Re: Samsung’s Violation of
11 January 27, 2012 Damages Discovery Order (“Roberts Reply Declaration”);

12 4. The confidential, unredacted version of the Declaration of Grant L. Kim in
13 Support of Apple’s Reply in Support of Rule 37(b)(2) Motion Re: Samsung’s Violation of
14 January 27, 2012 Damages Discovery Order (“Kim Reply Declaration”);

15 5. Exhibits A-B, D, F, & H to the Olson Reply Declaration;

16 6. Exhibits A-C to the Roberts Reply Declaration;

17 7. Exhibits 9-10 & 13-18 to the Kim Reply Declaration.

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The above items contain material 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. Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at issue with the sealable portions highlighted. Redacted versions of items 1-4 are attached as exhibits hereto.

Dated: March 20, 2012

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.