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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**

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In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
Apple Inc. (“Apple”) submits this motion for an order to seal the following documents:

1. Exhibit D to the Reply Declaration of Marc J. Pernick in Support of Apple’s Rule 37(b)(2) Motion Based on Samsung’s Violation of the Court’s December 22, 2011 Order Regarding Source Code.

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.

Dated: March 30, 2012

MORRISON & FOERSTER LLP

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

Attorneys for Plaintiff
APPLE INC.