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10 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC

11
 12 UNITED STATES DISTRICT COURT
 13 NORTHERN DISTRICT OF CALIFORNIA
 14 SAN JOSE DIVISION

16 APPLE INC., a California corporation,
 17 Plaintiff,
 18 v.
 19 SAMSUNG ELECTRONICS CO., LTD., a
 Korean business entity; SAMSUNG
 20 ELECTRONICS AMERICA, INC., a New York
 corporation; SAMSUNG
 21 TELECOMMUNICATIONS AMERICA, LLC, a
 Delaware limited liability company,
 22 Defendants.
 23

Case No. 11-cv-01846-LHK
**APPLE INC.'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENTS
 UNDER SEAL RE APPLE'S MOTION
 TO EXCLUDE TESTIMONY OF
 SAMSUNG'S EXPERTS**

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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 Motion to Exclude Testimony of
5 Samsung’s Experts;

6 2. Exhibits to the Declaration of Jason R. Bartlett in Support of Apple’s Motion to
7 Exclude Testimony of Samsung’s Experts (“Bartlett Declaration”) that have been designated
8 confidential as set forth below; and

9 3. The confidential, unredacted version of the Declaration of Russell S. Winer in
10 Support of Apple’s Motion to Exclude Testimony of Apple’s Experts, and Exhibit 1 to the Winer
11 Declaration.

12 Exhibits 1, 22-23, 25, and 26 to the Bartlett Declaration and Paragraphs 25, 26, and 28 of
13 the Winer Declaration contain information that is highly confidential as set out in the Declaration
14 of Cyndi Wheeler in Support of Apple’s Administrative Motion to File Documents Under Seal re
15 Apple’s Motion to Exclude Testimony of Samsung’s Experts (“Wheeler Decl.”), filed herewith
16 under seal. It is Apple’s policy not to disclose or describe to third parties its confidential design,
17 trade secrets, or product development. (Wheeler Decl. ¶ 5.) The Apple-confidential material in
18 Exhibits 1, 22-23, 25, and 26 to the Bartlett Declaration relate to such trade secret information, as
19 detailed in the Wheeler Declaration. (*Id.* ¶ 2.) This information is highly confidential to Apple.
20 (*Id.*) The information described above could be used by Apple’s competitors to Apple’s
21 disadvantage if disclosed publicly. (*Id.*) The relief requested in this motion is necessary and is
22 narrowly tailored to protect confidential information, focusing only on specific portions of the
23 documents at issue. (*Id.* ¶¶ 2-6.)

24 Exhibits 3, 4, 8, 11, 13, 15, 16, 24, and 27 to the Bartlett Declaration, and the entire Winer
25 Declaration including Exhibit 1, contain materials and refer to information that Samsung has
26 designated as confidential under the protective order entered in this case. Apple expects that
27 pursuant to Civil Local Rule 79-5(d), Samsung will file a declaration seeking to establish good
28 cause to permit the sealing of these materials.

