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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**

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 Exhibit A to the Declaration of  
3 Marc J. Pernick in Support of Apple’s Opposition to Samsung’s Motion for Clarification  
4 Regarding the Court’s May 4, 2012 Order (“Pernick Decl.”). That Exhibit contains material that  
5 Samsung has designated as confidential under the protective order entered in this case. Apple  
6 expects that, pursuant to Civil Local Rule 79-5(d), Samsung will file a declaration seeking to  
7 establish good cause to permit the sealing of this material.<sup>1</sup>

8 Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at  
9 issue with the sealable portions highlighted.

10  
11 Dated: May 29, 2012

MORRISON & FOERSTER LLP

12  
13 By:           /s/ Michael A. Jacobs            
14 Michael A. Jacobs

15 Attorneys for Plaintiff  
16 APPLE INC.

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27 <sup>1</sup> By respecting the process, and moving to seal Samsung’s expert reports based on  
28 Samsung’s current designations, Apple does not waive any challenge to those designations under  
the Protective Order.