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 11 Attorneys for Plaintiff and
 Counterclaim-Defendant APPLE INC.

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

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

Case No. 11-cv-01846-LHK

**APPLE'S ADMINISTRATIVE
 MOTION TO FILE UNDER SEAL**

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

- 3 1. The confidential, unredacted version of Apple’s Reply In Support of Apple Inc.’s Motion
4 Pursuant To Rule 62(c) For Entry Of Preliminary Injunction Without Further Hearing
5 (“Reply”);
- 6 2. The confidential, unredacted version of Apple’s [Proposed] Findings of Fact and
7 Conclusions Of Law and Order Granting Preliminary Injunction (“Proposed Order”).

8 The documents above discuss confidential information that has been previously ordered
9 sealed by this Court. (*See* Dkt. No. 410 (sealing certain exhibits attached to the Declaration of
10 Francis Ho and certain other documents).) They also contain information that Samsung has
11 designated as confidential under the protective order entered in this case. Pursuant to Civil L.R.
12 79-5(d), Samsung has filed the Declaration of Hankil Kang in Support of Samsung’s
13 Administrative Motion to File Documents Under Seal (*see* Dkt. No. 977-2, the “Kang
14 Declaration”) for the purpose of establishing that the designated information is sealable. The
15 Kang Declaration provides evidence that the information designated as confidential in Apple’s
16 Reply and Proposed Order is “privileged or protectable as a trade secret or otherwise entitled to
17 protection under the law,” and thus sealable. Civil L.R. 79-5(a).

18 Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk the documents at
19 issue with the sealable portions highlighted. Redacted versions of the documents at issue are
20 attached as an exhibits hereto.

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23 Dated: May 31, 2012

MORRISON & FOERSTER LLP

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

26 Attorneys for Plaintiff
27 APPLE INC.
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