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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

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 17 APPLE INC., a California corporation,
 18 Plaintiff,
 19 v.
 20 SAMSUNG ELECTRONICS CO., LTD., a
 Korean corporation; SAMSUNG
 21 ELECTRONICS AMERICA, INC., a New
 York corporation; and SAMSUNG
 22 TELECOMMUNICATIONS AMERICA,
 LLC, a Delaware limited liability company,
 23 Defendants.
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Case No. 11-cv-01846-LHK
**APPLE'S ADMINISTRATIVE
 MOTION TO FILE DOCUMENT
 UNDER SEAL RE APPLE'S
 OPPOSITION TO SAMSUNG'S
 MOTION FOR SUMMARY
 JUDGMENT**

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 confidential, unredacted version of Apple’s
3 Opposition to Samsung’s Motion for Summary Judgment (“Opposition”).

4 The Opposition contains information that is highly confidential as set out in the
5 Declaration of Cyndi Wheeler in Support of Apple’s Administrative Motion to File Documents
6 Under Seal (“Wheeler Declaration”), filed herewith. It is Apple’s policy not to disclose or
7 describe to third parties its confidential financial, design, trade secrets, or product development
8 information. (Wheeler Declaration ¶ 11.) The Apple-confidential material in the Opposition
9 relates to such confidential information, as detailed in the Wheeler Declaration. (*Id.* ¶ 1-10.)
10 This information is highly confidential to Apple and could be used by Apple’s competitors to
11 Apple’s disadvantage if disclosed publicly. (*Id.*) The relief requested in this motion is necessary
12 and is narrowly tailored to protect confidential information, focusing only on specific portions of
13 the brief at issue. (*Id.* ¶ 14.)

14 Certain portions of the Opposition refer to information that Samsung has designated as
15 confidential under the protective order entered in this case. Apple expects that, pursuant to Civil
16 Local Rule 79-5(d), Samsung will file a declaration seeking to establish good cause to permit the
17 sealing of these materials. In addition, the Opposition contains highly confidential damages-
18 related expert materials, which the parties have stipulated should be submitted to the Court under
19 seal and not placed on the public record. (Wheeler Decl. ¶ 12.)

20 Pursuant to Civil Local Rule 79-(c), Apple will lodge with the Clerk a fully unsealed
21 version of the Opposition with the sealable portions highlighted.

22 Dated: May 31, 2012

MORRISON & FOERSTER LLP

24 By: /s/ Michael A. Jacobs
MICHAEL A. JACOBS

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26 Attorneys for Plaintiff
APPLE INC.