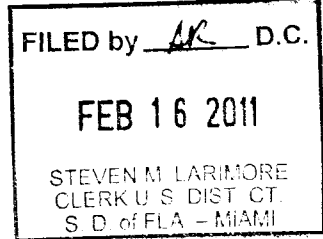


Sealed

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:10cv023580-Civ-UU



MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

JURY TRIAL DEMANDED

**JOINT MOTION TO SEAL THE PARTIES' JOINT MOTION
FOR EXTENSION OF DEADLINE TO SELECT A MEDIATOR**

Motorola Mobility, Inc., Motorola, Inc., and Apple Inc. (together, the "Parties") jointly file this Motion to Seal the Parties' Joint Motion for Extension of Deadline to Select a Mediator, and state:

1. The Parties are filing a Joint Motion for Extension of Deadline to Select a Mediator, dated February 16, 2011 ("Joint Motion for Extension of Deadline to Select a Mediator"). The original Joint Motion for Extension of Deadline to Select a Mediator and one copy are enclosed in separate envelopes attached hereto as composite Exhibit "A."

2. In support of the Parties' Joint Motion for Extension of Deadline to Select a

Mediator, the Parties make reference to the status of settlement-oriented discussions, which are highly confidential.

3. The Parties' joint settlement reports in actions pending in other venues have been filed under seal.

4. Accordingly, the Parties request leave to file their Joint Motion for Extension of Deadline to Select a Mediator under seal.

5. The Parties respectfully request that their Joint Motion for Extension of Deadline to Select a Mediator remain under seal through the final resolution of the above captioned action, including during any periods of appeal taken by any party to this case, except as otherwise ordered by this Court or required by law. Upon final resolution of the above captioned action, including all appeals, the Parties respectfully request that the Joint Motion for Extension of Deadline to Select a Mediator be destroyed.

6. A proposed order granting this motion is attached hereto as Exhibit "B."

WHEREFORE, Motorola Mobility, Inc., Motorola, Inc., and Apple Inc. respectfully request that this Court enter an Order:

A. Granting this Joint Motion to Seal the Parties' Joint Motion for Extension of Deadline to Select a Mediator.

B. Authorizing the Parties' Joint Motion for Extension of Deadline to Select a Mediator to be filed under seal.

C. Directing the Clerk to maintain the Joint Motion for Extension of Deadline to Select a Mediator under seal through the final resolution of the above captioned action, including during any periods of appeal taken by any party to this case, except as otherwise ordered by this Court or required by law.

D. Directing the Clerk to destroy the Joint Motion for Extension of Deadline to Select a Mediator upon final resolution of the above captioned action, including all appeals.

E. Granting the Parties such other or further relief as is deemed just and proper.

Dated: February 16, 2011

s Edward M. Mullins

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2011, the foregoing document was served via U.S.

Mail on all counsel of record listed on the attached Service List.

/s/ Hal M. Lucas

Hal M. Lucas

SERVICE LIST

Motorola Mobility, Inc. v. Apple, Inc.
Case No.: 1:10-23580-CIV-UNGARO/Simonton
United States District Court, Southern District of Florida

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Attorneys for Apple, Inc.

EXHIBIT A

EXHIBIT B

Sealed

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 1:10cv023580-Civ-UU

MOTOROLA MOBILITY, INC.,

Plaintiff,

v.

APPLE INC.,

Defendant.

APPLE INC.,

Counterclaim Plaintiff,

v.

MOTOROLA, INC. and
MOTOROLA MOBILITY, INC.,

Counterclaim Defendants.

JURY TRIAL DEMANDED

**ORDER GRANTING JOINT MOTION TO SEAL THE PARTIES' JOINT
MOTION FOR EXTENSION OF DEADLINE TO SELECT A MEDIATOR**

The Court having considered the parties' Joint Motion to Seal the Parties' Joint Motion for Extension of Deadline to Select a Mediator ("Joint Motion to Seal"), and other being advised in the premises, it is hereupon ORDERED AND ADJUDGED that:

1. The Joint Motion to Seal is GRANTED.
2. The Parties' Joint Motion for Extension of Deadline to Select a Mediator, dated February 16, 2011, ("Joint Motion for Extension of Deadline to Select a Mediator") shall be filed under seal.

3. The Clerk shall maintain the Joint Motion for Extension of Deadline to Select a Mediator under seal through the final resolution of the above captioned action, including during any periods of appeal taken by any party to this case, except as otherwise ordered by this Court or required by law.

4. The Clerk shall destroy the Joint Motion for Extension of Deadline to Select a Mediator upon final resolution of the above captioned action, including all appeals.

DONE AND ORDERED in Chambers in Miami, Florida, on this ____ day of February, 2011.

Honorable Ursula M. Ungaro
United States District Judge

Copies to:
All Counsel of Record