

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

LODSYS, LLC,

Plaintiff,

v.

COMBAY, INC.;
ICONFACTORY, INC.;
ILLUSION LABS AB;
MICHAEL G. KARR D/B/A
SHOVELMATE;
QUICKOFFICE, INC.;
RICHARD SHINDERMAN;
WULVEN GAME STUDIOS,

Defendants.

CIVIL ACTION NO. 2:11-cv-272-TJW

APPLE INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL
EXHIBIT A TO THE DECLARATION OF JONATHAN C. SANDERS IN SUPPORT OF
APPLE INC.'S MOTION TO INTERVENE

Apple Inc. ("Apple") submits this motion for leave to file under seal (the "Motion") Exhibit A to the Declaration of Jonathan C. Sanders in Support of Apple's Motion to Intervene ("Exhibit A"). Apple has met and conferred with Plaintiff Lodsys, LLC ("Lodsys"), and, as of the filing of this document, Lodsys has not agreed to the Motion.

Exhibit A contains confidential information regarding an Apple license agreement. Because a protective order has not yet been entered in this case, Apple respectfully moves for leave to file Exhibit A under seal. Apple respectfully requests that the Court enter the attached order allowing Apple to file Exhibit A under seal.

Dated: June 9, 2011

Respectfully submitted,

By /s/ Eric H. Findlay

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**Counsel for Intervenor Defendant and
Counterclaim Plaintiff Apple Inc.**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 9th of June, 2011.

/s/ Eric H. Findlay _____

Eric H. Findlay

CERTIFICATE OF CONFERENCE

This is to certify that, on June 9, 2011, Jonathan C. Sanders, counsel for Apple Inc., and Michael Goldfarb, counsel for Plaintiff, conducted the personal conference required by Civil Rule 7(h), and that, as of the filing of this document, Plaintiff has not agreed to this Motion for Leave to File Under Seal.

/s/ Eric H. Findlay _____

Eric H. Findlay